Draft Initial Study/Proposed Supplement to an Environmental Impact Report
Producers Dairy Cheese Plant Project

November 2016

Prepared for:
City of Fresno
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This statement is prepared in compliance with the California Environmental Quality Act

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1.0 Project Information

Project Title:	Producers Dairy Cheese Plant Project
Lead Agency:	City of Fresno
Location:	450 E. Belmont Ave, Fresno, CA 93701 (Accessor Parcel Numbers 459-032-23, 459-032-15, and 459-032-05)
Applicant:	Producers Dairy Foods, Inc.
Existing General Plan Land Use Designation:	The project site is designated as Light Industrial in the City of Fresno General Plan.
Existing Zoning:	The project site is zoned for IL – Industrial Light
On-Site Land Uses:	The project site is currently used for delivery trailer parking.
Surrounding Land Uses:	Land uses along the northern portion of the property consist of several auto/mechanic businesses across E. Belmont Avenue. Uses along the southern portion of the property consist of an alley in the center, and several residential lots. The western portion of the property includes a parking lot and several residential lots across N. Ferger Avenue, while the eastern portion of the property includes several residential lots across N. Roosevelt Avenue.
Description of Project:	See Project Description in Section 3.0 of this Initial Study.
Interested and Responsible Agencies:	None.

2.0 Introduction

The Producers Dairy Foods Corporation (Producers), which was first incorporated in Fresno on December 22, 1932, owns a 1.83-acre property located at 450 East Belmont Avenue, Fresno, California, 93701 (Accessor Parcel Numbers 459-032-23, 459-032-15, and 459-032-05). The property is situated on the south side of East Belmont Avenue, East of Ferger Avenue and West of Roosevelt Avenue within the city limits of Fresno, CA. This property was previously identified as being within the La Sierra Tract (lots 1-8, 35-42 of Block 1), now Tower District, which was annexed into the City in 1899. The property falls within the City of Fresno and as such is under the regulatory jurisdiction of the Fresno General Plan and specifically within the boundaries of the Tower District Specific Plan. The property contains two buildings fronting onto North Roosevelt Avenue and East Belmont Avenue which are masonry brick construction designed with two out of the fourteen attributes typically identified with the Mission Revival style. The North Building, wrapping the Belmont/Roosevelt corner, was initially constructed in 1929 as a one story Milk Bottling Plant for the Parkside Dairy. The South Building, a one-story complex to the south facing onto Roosevelt Avenue, was initially constructed in 1932 as an ice cream plant. The buildings were last utilized by KF Foods in 1986. Since then, the buildings have remained vacated and remain in advanced stages of disrepair.

In 1990, Producers initially proposed a construction project to demolish the existing South building on the project site and build an additional three buildings for light industrial purposes **(Figure 15)**. The project was incorporated into the 1991 Tower District Specific Plan Final Environmental Impact Report (Report No. 10108 or FEIR). The FEIR Land Use Modifications/Conditions section approves a land use designation change from General Commercial to Light Industrial. Additionally, the FEIR outlines Mitigation Measures specific to that proposed construction project. That project was abandoned due to reasonably unforeseeable circumstances; however, the Mitigation Measures specific to that project are still contained in the FEIR.

Producers is now proposing to demolish the aforementioned buildings and construct a parking lot to accommodate the company's expanding need for commercial truck parking and storage associated with Producers' Ice Cream production facility at 144 E. Belmont Avenue. The proposed project (Project) varies in scope from the original project in the 1991 FEIR. The Mitigation Measures outlined in the Tower District Specific Plan FEIR do not align with the proposed Project.

2.1 Initial Study

The purpose of this Initial Study (IS) is to identify the potential environmental impacts associated with the Project and describe measures that will avoid or mitigate impacts to a less than significant level. The IS includes information to substantiate the conclusions made regarding the potential of the Project to result in significant environmental impacts and provides the basis for input from public agencies, organizations, and interested members of the public. Pursuant to §15367 of the *California Environmental Quality Act (CEQA) Guidelines,* the City of Fresno is the Lead Agency for the proposed project, and as such, has primary responsibility for approval or denial of the proposed project.

The IS has been prepared in accordance with the CEQA Statutes and Guidelines, including §15070-15075 of the *State CEQA Guidelines*. Pursuant to Public Resources Code (PRC) §21157.1 and *State CEQA*

Guidelines §15177, this project has been evaluated with respect to each item on the *State CEQA Guidelines* Appendix G environmental checklist to determine whether this project may cause a significant impact. The analysis contained in this IS concludes that the proposed project would result in the following categories of impacts, depending on the environmental issue involved: no impact; less than significant impact; less than significant with project-level mitigation incorporated, and potentially significant impact. The 1991 Tower District Specific Plan FEIR, as discussed in detail in Section 2.2 and 6.5 of this IS, contains mitigation measures calling for the retention of the North building on the subject property. The proposed project will not support this mitigation measure, and proposes the removal of non-applicable mitigation measures from the Tower District FEIR through a focused Supplement to an Environmental Impact Report (SEIR). The IS has concluded that the proposed project would result in adverse effects to cultural resources which fall within the "Mandatory Findings of Significance" contained in §15065 of the *State CEQA Guidelines*. These cultural resource impacts will be analyzed though a SEIR to the 1991 Tower District FEIR.

2.2 Background CEQA Documents

The proposed project falls within the City of Fresno and as such is under the regulatory jurisdiction of the Fresno General Plan and specifically within the boundaries of the Tower District Specific Plan. A FEIR was approved in 1991 for the Tower District Specific Plan entitled the Final Environmental Impact Report No. 10108, City of Fresno, Tower District Specific Plan. This FEIR identified the proposed project site, inadvertently misidentified as 144 E. Belmont Avenue in the FEIR. The correct address is 450 E. Belmont Avenue and will be referenced as such herein. The Land Use Modifications/Conditions section of the FEIR approves a land use designation change from General Commercial to Light Industrial. This section also addresses proposed construction to demolish the existing South building on the project site and build an additional three buildings for light industrial purposes **(Figure 15)**. The FEIR incorporates Mitigation Measures specific to the proposed construction project. The FEIR states:

> "The first modification consists of 1.83 acres located at the south side of E. Belmont Avenue between N. Ferger and N. Roosevelt Avenues. The Specific Plan designation has been amended from General Commercial to Light Industrial. Height and setback requirements are imposed as conditions of rezoning, which are also mitigation measures required by this EIR. (Refer to Plan Amendment 90-24 and Rezoning Application 90-49.) Mitigation measures shall preserve the unique appearance and masonry craftsmanship of the building and insure the greatest degree of architectural compatibility of new construction with the existing structure and with surrounding properties. Further, noise-control measures shall be placed on the operation of the proposed development and the operation of truck activities. These measures are set forth on Table B."

Table B of the FEIR, entitled "Mitigation Measures for 144 E. Belmont", contains a total of nine mitigation measures related to the project site.

1. The project shall retain the existing building at the southwest comer of East Belmont and North Roosevelt Avenues as depicted on attached Exhibit "L-1 ".
2. Retention and renovation of the facade of the existing building immediately south of the. Building at the southwest comer, as shown on Exhibit "L-1", as is physically possible and economically practical. If the facade fails due to structural distress it should be rebuilt to resemble the existing historical structure as closely as possible, using the remnant bricks from the fallen facade. All precautions in concert with common practices standard to the industry shall be taken to save the

facade intact. However, no implicit guarantee can be given that the facade will not fail during the demolition and renovation process.

3. The new construction in the infill areas on the east side of the property shall be compatible with the existing structure as shown on Exhibit "L-2".
4. The new construction contemplated immediately west of the facade described above shall be no higher than the height of the facade for a minimum of twenty feet west of the facade.
5. The new building to be constructed immediately west of the 30-foot existing building at the northwest comer of the sight as shown on Exhibit "L-1" shall be of a height equal to or slightly greater than the westerly portion of said building, but in no case higher than forty feet and shall be compatible with the existing structure to the east as shown on Exhibit "L-2".
6. The owner shall provide and maintain street trees in tree wells in the sidewalk on the west side of the property south to the entry driveway. These trees and major trees planted along the remainder of the west and south sides of the property shall be a species that attain a minimum height of thirty feet (30' -0") at maturity.
7. The future high density frozen storage building proposed for phase three shall be set back a minimum of fifty feet (50' -0") east of Ferger Avenue to the height of sixty feet (60' -0"), or sixty feet with a minor deviation as provided by the Fresno Municipal Code.
8. All noise producing equipment on the building shall meet the standards of the City of Fresno. Truck noise shall not exceed the level of forty-five decibels (45db) inside adjacent residences between the hours of 10:00 p.m. and 6:00 a.m. If noise levels exceed that criteria, mediation measures shall be imposed by the City of Fresno which could include restrictions on hours of operation.
9. All truck maneuvering and parking shall take place on site and shall be subject to the requirements of the City of Fresno.

2.3 Public and Agency Review

This Initial Study and Supplement to an Environmental Impact Report is available for review at the following locations:

City of Fresno
Development and Resource Management Department
2600 Fresno St
Fresno, CA 93721
(559) 621-8003

The document is also available on the City of Fresno website at: http://www.fresno.gov/Government/DepartmentDirectory/DARM/DevelopmentServices/MajorProjects.htm

2.4 Project Approvals

As a public agency principally responsible for approving or carrying out the proposed project, the City of Fresno is the Lead Agency under CEQA and is responsible for adopting the environmental document and approving the proposed project. The discretionary approval would be required form the Planning Commission. Approval of the Producers Dairy Cheese Plant Project is anticipated to occur at the same time as the CEQA document adoption.

2.5 Organization of the Initial Study

This Initial Study is organized into the following sections:

Section 1 – Project Information:
Provides summary background information about the proposed project, including project location, lead agency, and contact information.

Section 2 – Introduction:
Summarizes the scope of the document, the project's review and approval processes, and the document's organization.

Section 3 – Project Description:
Presents a description of the proposed project, including the need for the project, the project's objectives, and the elements included in the project.

Section 4 – Environmental Factors Potentially Affected:
Addresses whether this Initial Study identifies any environmental factors that involve a significant or potentially significant impact that cannot be reduced to a less than significant level.

Section 5 – Determination:
Indicates whether impacts associated with the proposed project would be significant and what, if any, additional environmental documentation is required.

Section 6 – Evaluation of Environmental Impacts:
This section includes descriptions of the existing environmental setting in the project area and analyses of the potential environmental impacts that would occur from implementation of the proposed project and alternatives.

Section 7 – Mandatory Findings of Significance:
State CEQA Guidelines Section 15065 requires that a lead agency reach a mandatory finding of significance by preparing an EIR that presents substantial evidence to support a determination that any of the following conditions may result from a proposed project.

Section 8 – Mitigation Measures:
This section is a summary of all mitigation measures, prescribed ESA's and any other conditions pursuant to CEQA committed to in previous sections of the document.

Section 9 – References:
List of references utilized in this document.

Section 10 – Report Preparers:
List of report prepares.

3.0 Project Description

3.1 Project Summary

As outlined in Development Permit No. D-16-088, Producers Dairy Foods, Inc. proposes to remove 2 boarded-up buildings at 450 E. Belmont Avenue totaling approximately 12,500 square feet, and to replace the existing C.M.U wall and chain link fence with a security fence on the north half of the property facing E. Belmont Avenue and businesses on the North, Northeast, and Northwest portion of the property, and a 12-foot-high sound wall facing residential properties on the South, Southeast, and Southwest portion of the property. The sound wall will mitigate the noise/visual impacts to the surrounding area. The purpose of this proposed project is to secure additional parking for Producers Dairy delivery trailers due the loss of delivery trailer parking at 1762 G Street. Accommodating these delivery trailers at 450 E. Belmont Avenue would be consistent within the property's existing use.

Without the proposed project, the current Producers Dairy delivery trailers located at 1762 G Street will need to be moved to another undetermined location, which would possibly impact other areas from additional noise/traffic conditions from the relocated delivery trailers. Additionally, the 2 boarded up buildings would continue to be a potential safety hazard.

Project construction will start with the controlled demolition of the existing boarded-up buildings, removal of their foundations, and removal of the existing fence/wall. The second stage will consist of constructing a 12-foot-high sound wall and security fence surrounding the property.

Figure 1 – Regional Map

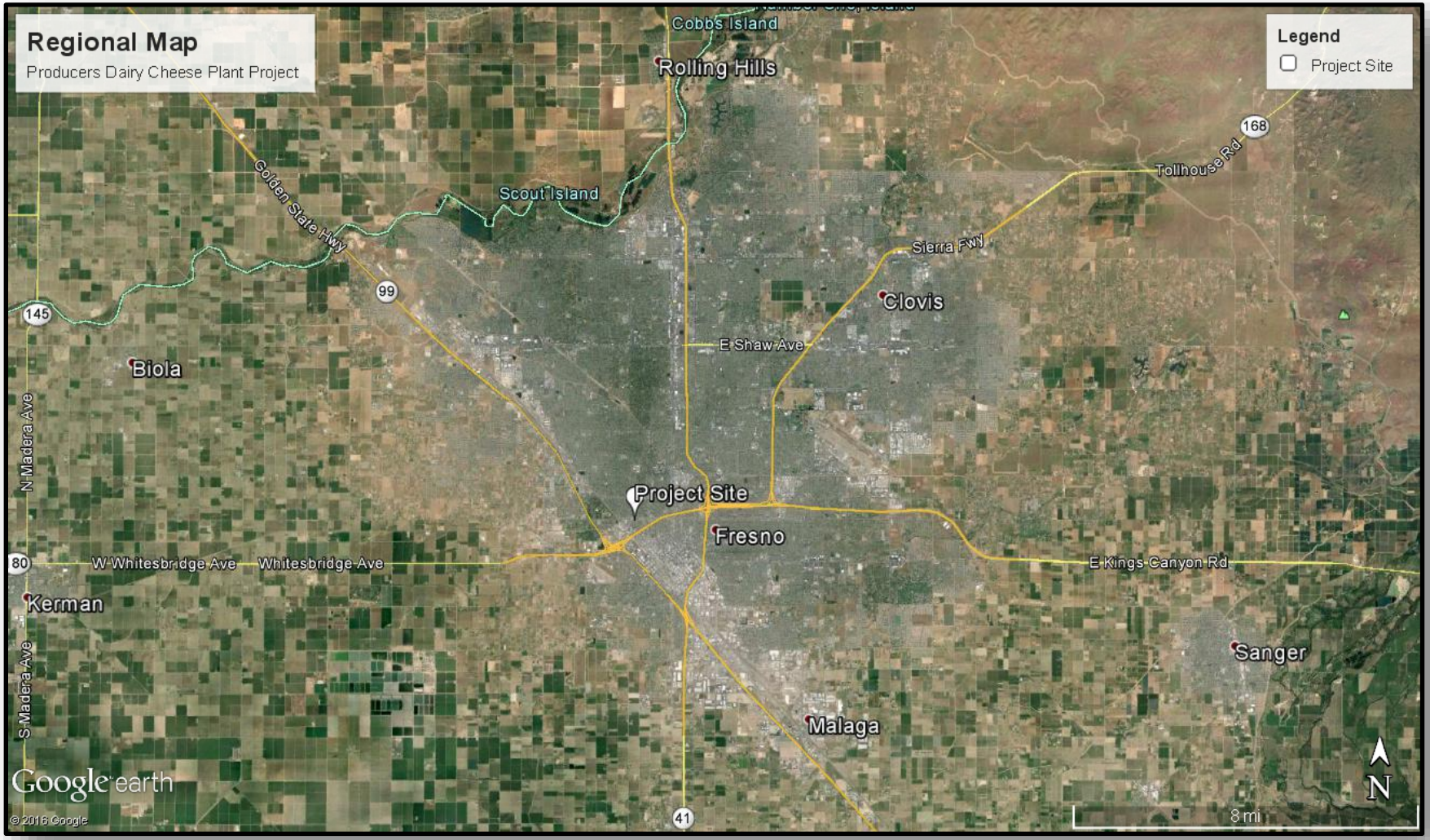


Figure 2 – Site Map

Figure 3 – Site Zoning Map

Figure 4 – Site Plan

Development Permit No. D-16-088

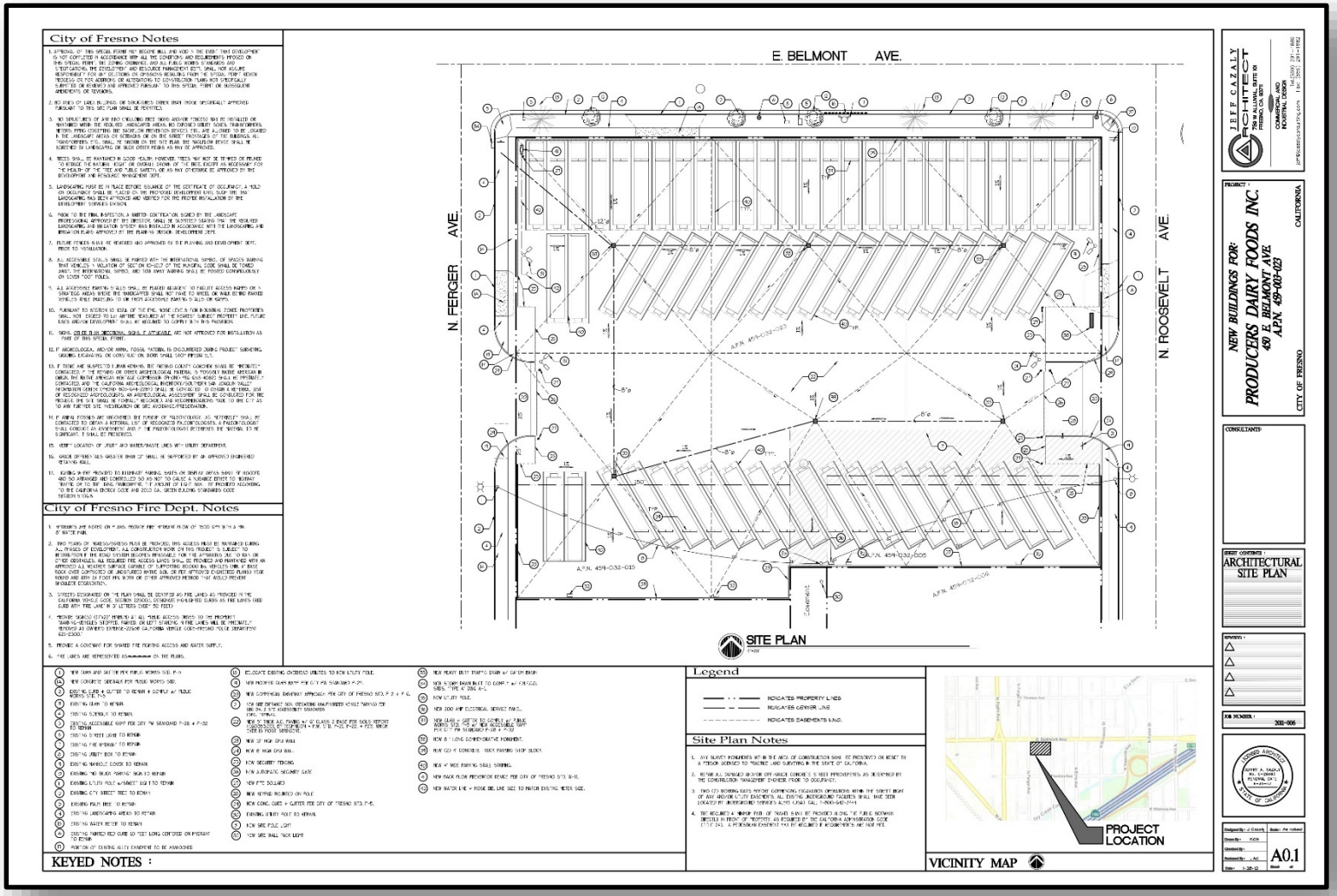


Figure 5 – Sound Wall & Fencing

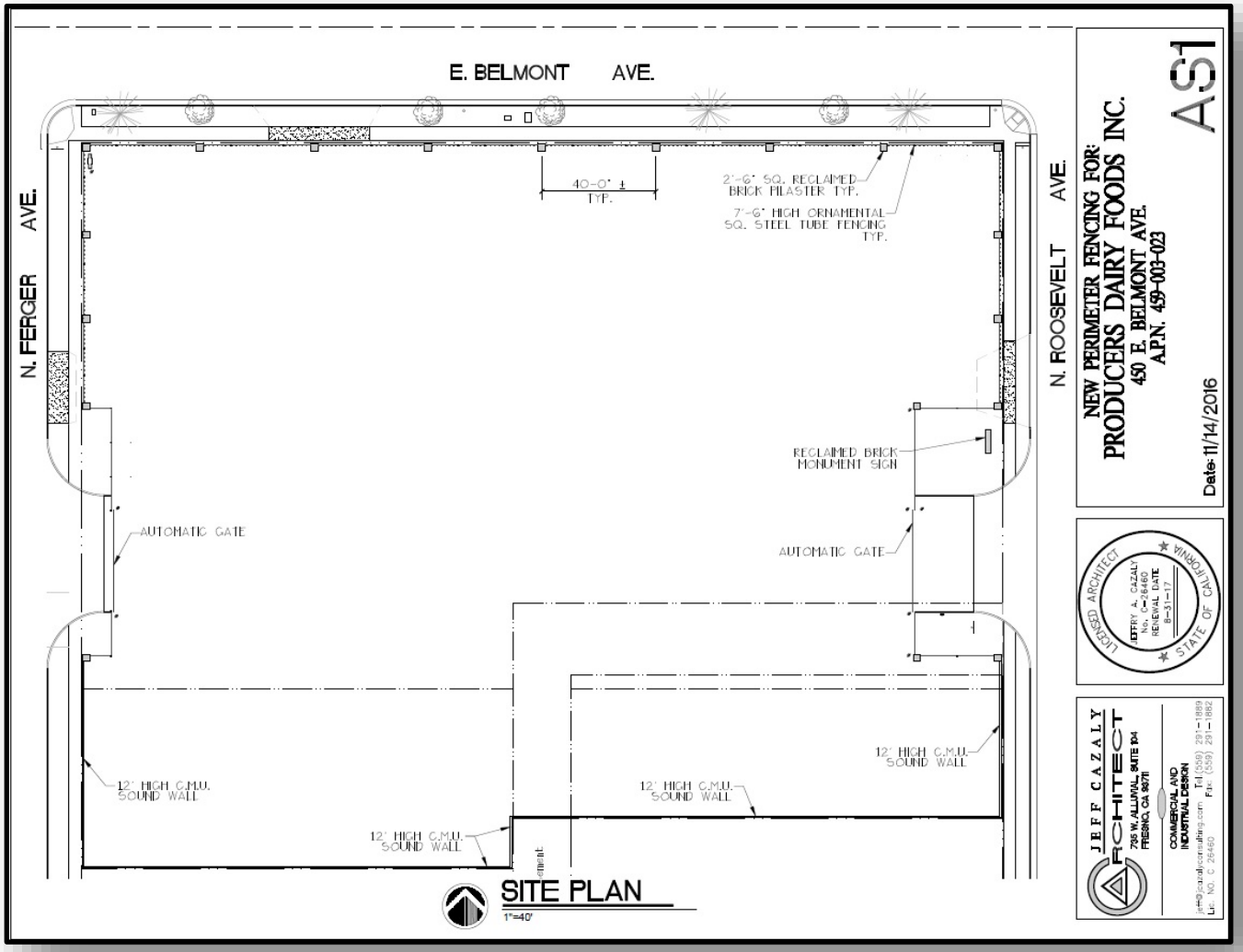


Figure 6 – Fencing

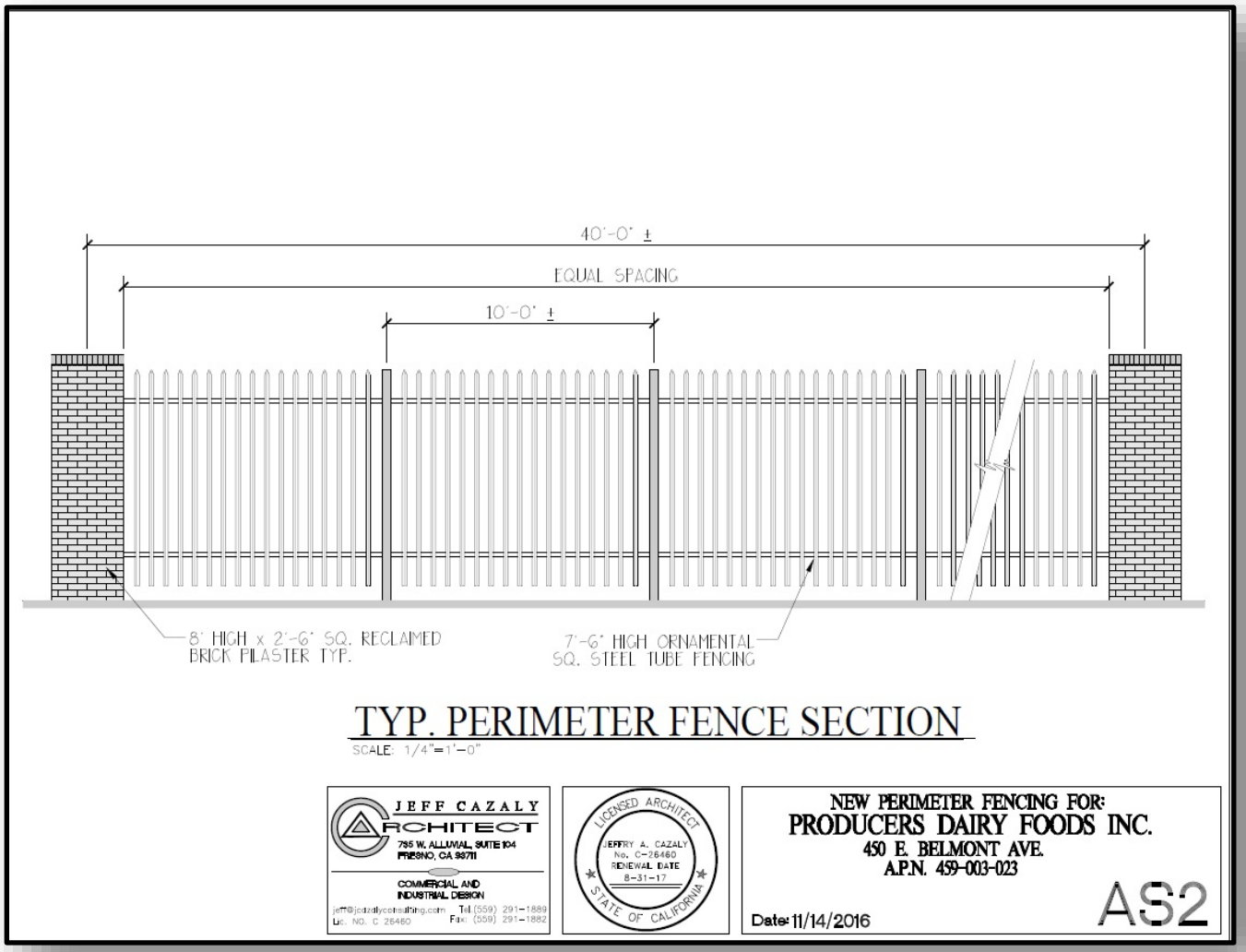
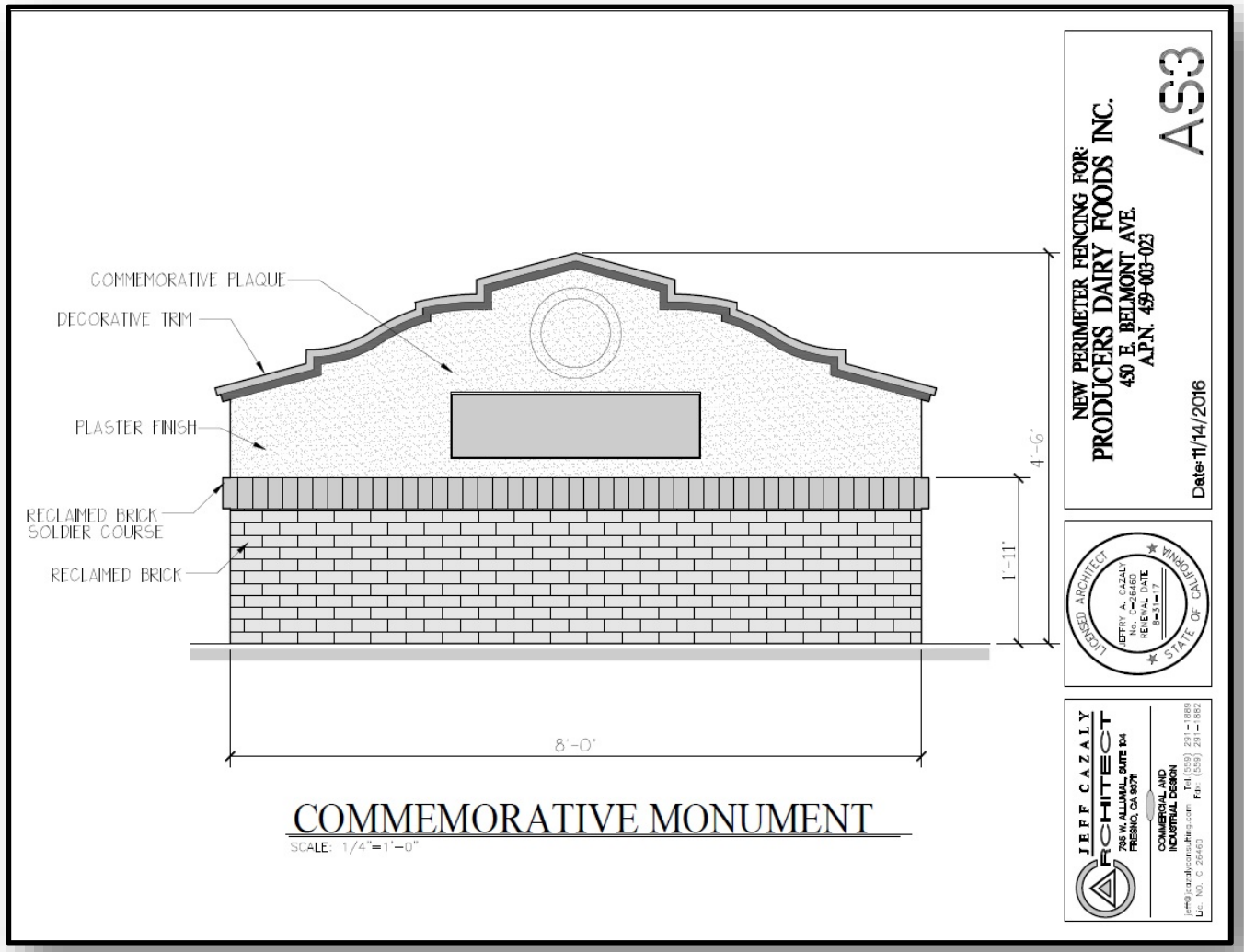


Figure 7 – Commemorative Monument



3.2 Project Background and Objectives

The primary objectives of the proposed project are as follows:

1. Secure additional parking for Producers Dairy delivery trailers, which will necessitate demolition of the two existing buildings on the site.
2. Systematically remove the two existing buildings on site to expand delivery trailer parking on the proposed project site.
3. Reuse, to extent feasible, the remaining portions of the buildings and architecturally incorporate the material into an aesthetically appealing wall along the subject property.
4. Reduce public safety hazards by eliminating the risk of fire, structural collapse, personal injury to trespassers, vandalism and crime, and by demolishing structurally unsound buildings that have been abandoned, deteriorated and damaged.

3.3 Project Site and Surrounding Uses

The project site is currently designated by the Fresno General Plan for light industrial planned uses and is zoned industrial light. The project site is currently used for delivery trailer parking. Land uses along the northern portion of the property consist of several auto/mechanic businesses across E. Belmont Avenue. Uses along the southern portion of the property consist of an alley in the center, and several residential lots. The western portion of the property includes a parking lot and several residential lots across N. Ferger Avenue, while the eastern portion of the property includes several residential lots across N. Roosevelt Avenue.

The front (North) of the property is located on Belmont Ave which contains largely main street commercial businesses. These buildings consist of low one-story painted brick or stucco buildings. Most businesses are either automotive related (car repair, hubcaps, etc.) or convenience stores. Many buildings along Belmont Avenue, including 471, 479, 504, and 517 E. Belmont Avenue, are currently boarded up and in a state of disrepair. Buildings along N. Ferger Avenue and N. Roosevelt Avenue consist of 1-1.5 story single family residences with the exception of one 2 story multi-family residence on N. Roosevelt Avenue. The boarded up entry to the two brick buildings on the proposed project face onto N. Roosevelt Avenue. Two single family residences currently border the southern boundary of the proposed project.

3.4 Construction Activities

A. ***Demolition:***

1. Remove six existing drive approaches and associated sidewalks.
2. Mitigate existing lead and asbestos from existing buildings.
3. Remove two existing buildings (approx. 12,500 square feet). Prior to demolition remove existing overhead electrical utilities fed from across Belmont Ave.
4. Remove existing building foundations.
5. Remove approx. 550 linear feet of existing Concrete Masonry Unit (CMU) fence.
6. Remove Approx. 500 linear feet of existing chain link fencing and gates.
7. Remove existing paving and sub grade to approx. depth of -1 '-0" (64,000 cubic feet. approx.).
8. Remove existing vault as indicated on Demo Plan Sheet D1 .0.

B. ***New Off Site Construction:***

1. Install new sidewalk, curb and gutter at areas where existing drive approaches were demolished. Install per City of Fresno Public Works Std. P-2 and P-6.
2. Install new accessible ramp with truncated domes at corner of Belmont and Roosevelt. Install per City of Fresno Public Works Std. P-28 and P-32.
3. The City of Fresno may require any damaged curb, gutter, and sidewalks to be replaced.
4. Install new storm water inlet/outlet per F.M.F.C.D. Std. "Type A" per Dwg. A-1.

C. ***New Onsite construction:***

1. Install new storm water drain lines and inlets as indicated on Arch. Site Plan Sheet. A0.1.
2. Scarify 12" of Sub Grade and re-compact to 95 percent R. C. per Soils Report. (attached).
3. Excavate for new sound wall foundation system. Foundation consists of caissons with a grade beam cap. Caissons to be 18" dia. X 7'-0" deep w/ (6) #6 vertical reinf. Extending and lapping into grade beam above. Caissons will be spaced 8'- 0" o.c. max. with additional caissons at wall corners and end points. Grade beam will be 3'-0" wide x 2'-0" deep w/ (4) #6 cont. reinf. top and bottom & #3 ties at 24" o.c.
4. Install new 12" Thick x 12'-0" High sound wall. Wall to be reinforced w/ (2) #5 verticals @ 8" o.c. and #5 horiz. @ 16" o.c. There is approx. 490 linear feet of wall and grade beam. C.M.U. sound wall should utilize a combination of split face and smooth face colored block. Selection will be made from Manuf. Standards.
5. Install new utility pole and relocate existing overhead utilities to new pole. Install new 200-amp service panel as indicated on Arch. Site Plan Sheet A0.1.
6. Install new electrical conduit from new service panel to all new light locations. Install gate sensor loops at interior side of each gate. Lights occur as wall packs and as pole mounted type. Excavate/drill pole light foundation holes. Pole foundations to be 2'-6" Dia. With (4) # 5 verticals and #4 ties at 12" o.c. Pole foundation to extend 8'-0" into soil with a 4'-0" extension above grade. Pole to be 20'-0" in height with (2) 426 heads at each location.
7. Place road base and AC. Paving per traffic index 8.5 as indicated in the soils report.
8. Install decorative iron fence with brick pilasters of appropriate spacing along Belmont Ave, and northern half of the Roosevelt and Ferger Avenues. Gates to be operable by both interior loop sensor and remote control.

D. ***Misc:***

1. A commemorative monument **(Figure 7)** with a plaque explaining the history of the original building on the site. The monument will have a 2'-6" base foundation with an 8'-0" long x 5'-0" high x 6" thick wall. The wall portion will be faced and capped with brick from the existing buildings.
2. Other options for the commemorative monument may include designing the monument to incorporate a curved parapet to mimic the current building design features.

3.5 Project Site Structural Integrity Analysis

In order to assess the feasibility of the Tower District FEIR mitigation measure calling for the retaining of the North building at 450 E. Belmont Avenue, a Schematic Condition Assessment was conducted by Gaylord Ransom, S.E. and Klare Yavasile, S.E. of Brooks-Ransom Associates at the project site on September 14th, 2016 (Appendix A). In the subsequent report, the Structural Engineers found the following areas of concern regarding buildings integrity:

South Building:

- Unreinforced Red Brick Walls.
- Nominally reinforced CMU walls.
- Straight board roof sheeting with water damage and rot.
- Severe water damage to roof framing.
- Significant impact damage to the west wall.
- Step cracking in the east wall near the north corner.
- Deteriorated ceiling sheeting at the east side of the building.
- No wall ties from perimeter walls to the roof framing.
- Roof joist embedded directly in the masonry wall.
- No shear transfer from the roof" diaphragm" to the shear walls.

North Building

- A mixture of unreinforced red brick walls, wood stud walls, and light gage metal stud walls apparently all working as shear walls.
- Tall unreinforced red brick perimeter walls.
- Nominally reinforced CMU walls.
- Lack of roof diaphragm continuity between successive building additions.
- Offsets in wall lines with questionable means to distribute shear loads.
- West wall above moment frame is a diagonally sheeted wood wall with a plater finish on the outside.
- Straight wood board diaphragms exist in several areas of the building.
- Seriously damaged roof sheeting was observed in several areas of the building.
- There appears to be at least three major phases of construction. The nature of these separate phases seem to lack a coordination with the previous construction resulting in a lack in continuity and connection of the subsequent phases so as to provide a total building which will act as a whole during exposure to wind or seismic forces.
- The westerly most addition to the building has a significant vertical discontinuity in stiffness as the roof diaphragm forces move from a second story shear wall system to a steel moment from on the lower level.

The report also found that the construction and design practices at the time the buildings were constructed (in the early 1930's) made considerable use of unreinforced masonry design, which included elements that have since proven to perform badly when resisting code level seismic forces. These types of element include straight or diagonal board roof and floor sheeting, wall pockets in masonry walls to support roof or floor joist, a lack of shear transfer from the diaphragms to the shear walls, unreinforced red-brick masonry walls, and a lack of out-of-plane wall ties to the roof and floor diaphragms.

In order to comply with the Tower District FEIR mitigation measure requiring the preservation of the North building, substantial retrofitting activities would need to be undertaken. Because the red brick walls are not reinforced, the walls must be thoroughly tested to see if they qualify to remain as structural elements in the building. If they are found to be wanting, the walls must be heavily reinforced to remain as a part of the structural lateral load resisting system.

If the walls are retained, then the existing diaphragms will almost certainly need to the retrofitted and a new system of shear transfer from the diaphragms to the shears walls must be installed. Finally, the red

brick walls must be well tied to the diaphragms to resist the out-of-plane forces to which the wall may be exposed during an earthquake.

4.0 Environmental Factors Potentially Affected:

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

Aesthetics	☐
Agricultural Resources	☐
Air Quality	☐
Biological Resources	☐
Cultural Resources	☑
Greenhouse Gases	☐
Geology and Soils	☐
Hazards	☐
Hydrology and Water Quality	☐
Land Use and Planning	☐
Mineral Resources	☐
Noise	☐
Population and Housing	☐
Public Services	☐
Recreation	☐
Transportation/Circulation	☐
Utilities and Service Systems	☐
Mandatory Findings of Significance	☐

5.0 Determination

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the proposed proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment and AN ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or a "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to the applicable legal standards, and (2) has been addressed by mitigation measure(s) based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT will be prepared.

☑ I find that the proposed project MAY have a "potentially significant impact" and new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows mitigation measures or alternatives previously found to be feasible would not in fact be feasible, and significant effects previously examined will be substantially more severe than previously shown in the previous EIR. This would require only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation. Therefore, a SUPPLEMENT TO AN ENVIRONMENTAL IMPACT REPORT will be prepared.

Signature: _____ Date: 11/30/16

Mike Sanchez,
Assistant Director, Development and Resource Management
City of Fresno

6.0 Evaluation of Environmental Impacts

This section includes an evaluation of impacts based on the *State CEQA Guidelines* Appendix G Environmental Checklist. Each checklist item is explained in the discussion following the checklist and, if necessary, mitigation measures are provided to reduce impacts to a less than significant level. In accordance with CEQA, all answers take into account the whole of the action, including on- and off-site effects, cumulative and project level; direct and indirect effects, and effects from both construction and operation of any new development. Each checklist criterion is marked to identify whether there is an environmental impact.

- A "No Impact" response indicates that there is no impact.
- A "Less Than Significant Impact" response means that while there is some impact, the impact is below the threshold of significance defined by the City.
- A "Less Than Significant Impact with Mitigation" response indicates that a new impact has been identified in the course of this analysis and mitigation measures have been provided in this Initial Study to reduce a potentially significant impact to a less than significant level.
- A "Potentially Significant Impact" response indicates that an impact which is "potentially significant" as described above, but for which mitigation measures cannot be immediately suggested or the effectiveness of potential mitigation measures cannot be determined with certainty. In such cases, an EIR is required. If an EIR has already been prepared and a new information to be added to the EIR, then a Supplement to an EIR is required. Where appropriate, a Mitigation Measures section is included that lists mitigation measures for impacts identified as "Less than Significant with Project Mitigation". A "potentially significant impact" response indicates that the impact would exceed established thresholds and that the impact could not be avoided utilizing standard operation procedures and regulations, program requirements, or design features incorporated into a project, or that additional analysis is required in the EIR. These impacts will be further analyzed in the Supplement to an EIR prepared for this project.

A brief explanation is required for all answers except "No Impact" answer that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). All answers must take into account the whole action involved, including off-site as well as on-site, cumulative as well as project level, indirect as well as direct, and construction as well as operations impacts. "Potentially Significant Impact" is appropriate if there is substantial evidence leading to a fair argument that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made without the possibility of mitigation, then an EIR (or in this case Supplement to an EIR) is required.

6.1 Aesthetics

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
AESTHETICS – Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☑
b. Substantially damage scenic resources, including, but no limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☑
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☑	☐
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☑	☐

Environmental Evaluation

Environmental Setting

Visual Distance Zones

The following distance zones (foreground, middle ground, and background) are used to characterize the dominant visual character from each vantage point and describe views in terms that can be analyzed and compared. As discussed below, sensitivity of views modified from the natural environment is defined in order to establish thresholds for analysis of potential visual impacts resulting from the implementation of the proposed project.

Foreground Views. These views include elements that can be seen at a close distance and that dominate the entire view. Impacted views at this distance are generally considered potentially adverse when viewed by a sensitive viewer group, such as surrounding residents, workers, pedestrians, or regular motorists.

Middle Ground Views. These views include elements that can be seen at a middle distance and that partially dominate the view. Impacted views at this distance are generally considered potentially adverse when viewed by a sensitive viewer group.

Background Views. These views include elements that are seen at a long distance and typically do not dominate the view but are parts of the overall visual composition of the view. Impacted views at this distance are generally considered not to be an adverse impact when viewed by a sensitive viewer group.

Shading

The effects of shading by one building upon another can be either positive or negative depending upon the site-specific circumstances of the properties involved. A potential benefit of shading for adjacent structures may be a cooling effect gained during warm weather. Negative consequences of shading include the loss of natural light for passive or active solar energy applications or the loss of warming influences during cool weather. Factors influencing the relative impact of shadow effects are site-specific

and include differences in terrain elevation between involved properties, the height and bulk of structures, the time of year, the duration of shading in a day, and the sensitivity of adjacent land uses to loss of sunlight.

Regional Setting

Fresno is located in the central San Joaquin Valley, approximately 200 miles north of Los Angeles and 170 miles south of Sacramento. The City of Fresno is approximately 111 square miles in area and is characterized by urban and suburban development, with the downtown area featuring low-rise development and historic structures. The west, northwest, and south sides of Fresno are dominated by mostly flat relief and urban developments within the city limits. The unincorporated areas surrounding the city limits generally transition from urban uses to semi-rural and agricultural uses. Fresno is the fifth-largest city in California, with an official estimated population in 2010 of 494,665, as estimated by the California Department of Finance. The Sierra Nevada mountain range to the east as well as the Fresno River bluff are the most prominent visual resources in the Fresno area.

Visual Setting

The proposed project is located at 450 E. Belmont Avenue, on the south side of E. Belmont Avenue between N. Ferger Avenue and N. Roosevelt Avenue, within the Tower District in the City of Fresno. The project site contains two brick buildings which total approximately 12,500 square feet and are located in the northwest corner of the property. The two buildings are partially demolished and have been boarded up with plywood for approximately 30 years. The front (North) of the property is located on Belmont Ave which contains largely main street commercial businesses. These buildings consist of low one-story painted brick or stucco buildings. Most businesses are either automotive related (car repair, hubcaps, etc.) or corner stores. Many buildings along Belmont Avenue, including 471, 479, 504, and 517 E. Belmont Avenue, are currently boarded up and in a state of disrepair. Buildings along N. Ferger Avenue and N. Roosevelt Avenue consist of 1-1.5 story single family residences with the exception of one 2 story multi-family residence on N. Roosevelt Avenue. The boarded up entry to the two brick buildings on the proposed project face onto N. Roosevelt Avenue. Two single family residences currently border the southern boundary of the proposed project.

Views

Project limits were examined and determined if scenic resources exist within those limits including the project view shed. No views will be impacted by the proposal. Impact assessment determined no views of scenic resources will be obstructed. To adequately determine the presence of scenic resources, the District's Planning and Environmental units were consulted to ensure that all appropriate input and evaluation of the public's anticipated perception of the existing resource and its visual setting is considered.

The anticipated sensitivity of identified viewers was evaluated during a public forum held on September 20th, 2016. No local residents expressed any concern about views or the aesthetics of the proposed project. The Tower District Design Review Committee was also in attendance and expressed concern over the view of the project along E. Belmont Avenue. The committee inquired about the feasibility of retaining the façade of the North and South buildings in order to screen the project from E. Belmont Avenue. The feasibility of retaining the façade of the North and South buildings will be examined as a Project alternative in the proposed Supplement to an EIR.

Extent of visibility is approximately one block.

Figure 8 – Viewpoints Map

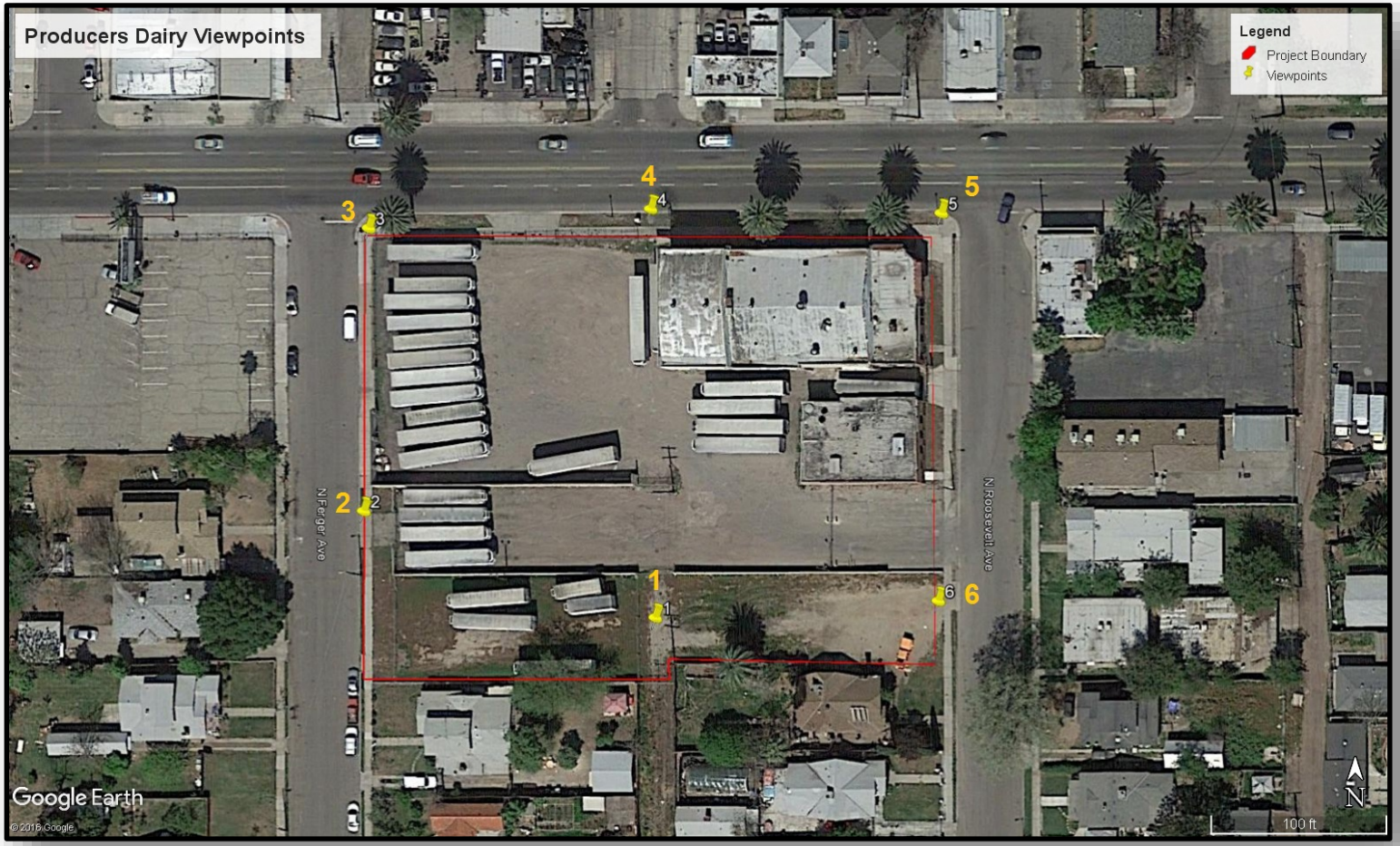


Figure 9 – Viewpoint 1

Figure 10 – Viewpoint 2

Figure 11 – Viewpoint 3

Figure 12 – Viewpoint 4

Figure 13 – Viewpoint 5

Figure 14 – Viewpoint 6

Discussion

a. No Impact. The project site is located on flat terrain in a commercial, industrial, and residential district. A scenic vista is generally considered a view of an area that has remarkable scenery or a resource that is indigenous to the area. Given the flat terrain and the surrounding buildings, no scenic views exist around the proposed project.

b. No Impact. The proposed project would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. The project exists in a fully developed area, and contains no scenic resources such as meadows or rock outcroppings. All existing city trees along roadways will remain and not be impacted by the proposed project. The project is also not within visual range of a state scenic highway according to an August 2016 review of Caltrans' list of State Scenic Highways. Therefore, the project would have no impact.

c. Less than Significant. Implementation of the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings. No significant visual features, landmarks, or scenic byways are located within the immediate surroundings. Four of the buildings within 200 feet of the subject site (471, 479, 504, and 517 E. Belmont Avenue) are currently boarded up and in a state of disrepair. The project site would continue to be used as parking for Producers Dairy delivery trailers. The current chain link fence along Belmont Avenue would be replaced with a decorative iron fence with brick pilasters utilizing brick from the demolition of the buildings, if possible (See **Figure 5 and 6,** and Section 6.5, MM CUL 6). A 12-foot-high decorative sound wall will be installed on the southwest, south, and southeast perimeters of the property. Given that the current southern wall is only 5 feet high, this new 12-foot decorative sound wall will serve to visually shield surrounding residences from the industrial operations currently on the proposed project. This decorative sound wall would be an aesthetic improvement to the site from the surrounding residential areas to the south, southwest, and southeast of the subject property (See **Figure 5**, and Section 6.12, MM NOI 1).

d. Less than Significant. The project site is located in the City of Fresno and is surrounded by urban development that currently includes streetlights along roadways, and adjacent institutional/ commercial/residential uses. Project lighting would consist of four pole lights (two currently exist onsite) located along Ferger and Roosevelt Avenues, and four wall pack lights on the inside face of the 12-foot-high cinderblock sound wall. The addition of project lighting would contribute incrementally to urban light sources but would not create a new source of substantial light or glare. Proposed lighting would be directional and/or shielded to minimize spillover into surrounding land uses. The 12-foot-high cinderblock sound wall would also serve to help shield light from residential units adjacent to the project site on the south border.

6.2 Agricultural Resources

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

Environmental Evaluation

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 provided in Forest Protocols adopted by the California Air Resources Board.

Environmental Setting

The 2025 Fresno General Plan analyzed the potential farmland impacts from urbanizing most agricultural land within the adopted City of Fresno Sphere of Influence. This project conforms to the 2025 Fresno General Plan. As described below, the proposed project would have no impacts to agriculture resources. Additionally, the proposed project would not result in any significant effects related to forestry resources.

Discussion

a. No Impact. The proposed project is located within a highly urbanized portion of the City of Fresno. Surrounding land uses include single family-detached residential, light industrial, and commercial land uses. The proposed project would not introduce a new adjacent use that could be incompatible with the current uses. Rather, the proposed project would provide the same type of activity that currently exists. The proposed project does not contain agricultural resources, is not zoned for agricultural uses,

and is not the subject of a Williamson Act contract. Therefore, no impacts to agricultural resources would occur.

b. No Impact. See item a. for more details.

c. No Impact. There are no forest lands or timberlands (or lands zoned as such) in the project area. The project would not result in the loss of forest land or conversion of forest land to non-forest use.

d. No Impact. See item c. for more details.

e. No Impact. The existing environmental is designated as Urban and Built UP Land on maps prepared pursuant to the Farmland Mapping and Monitoring Program and does not include conversion of Farmland to no-agricultural use or conversion of forest land to non-forest use.

6.3 Air Quality

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
AIR QUALITY – Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☑	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☑	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☐	☐	☑	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☑	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☑	☐

Environmental Evaluation

Regulatory Setting

The project site is located in Fresno County and within the San Joaquin Air Basin. This region has had chronic non-attainment of federal and state clean air standards for ozone/oxidants and particulate matter due to a combination of topography and climate. The San Joaquin Valley is enclosed in on three sides by mountain ranges, with prevailing winds carrying pollutants and pollutant precursors from urbanized areas to the north (and in turn contributing pollutants and precursors to downwind air basins). The Mediterranean climate of this region, with a high number of sunny days and little or no measurable precipitation for several months of the year, fosters photochemical reactions in the atmosphere, creating ozone and particulate matter.

The San Joaquin Valley Air Pollution Control District (SJVAPCD) is the local regional jurisdictional entity charged with attainment planning, rule making, rule enforcement, and monitoring under Federal and State Clean Air Acts and Clean Air Act Amendments. The California Air Resources Board (CARB), a component of the California Environmental Protection Agency, sets statewide air quality standards and adopts statewide air pollution control measures such as standards for off-road vehicles, smog-testing requirements applicable to on-road vehicles in the various air basins in the state, fuel formulation requirements for California and so forth. CARB evaluates and approves air pollution attainment plans proposed by local/regional air pollution control agencies in the state. The U.S. Environmental Protection Agency (EPA) sets national ambient air quality standards and is the agency, which has ultimate approval authority for air quality attainment plans in air basins which have chronically or seriously failed to attain the federal air quality standards.

Traditionally, EPA has set the on-road emission standards for vehicle manufacturers. In recent years, there has been some overlap and dispute of the respective authority of CARB and EPA in the matter of on-road vehicular emission standards. CARB has proposed to regulate overall carbon emissions pursuant

to state laws adopted to reduce "greenhouse gases," and the federal agency has disputed the state's right to do this. Litigation on these issues is underway.
With respect to adopted air quality standards of the EPA and CARB, the San Joaquin Valley Air Basin (SJVAPCD) has been classified as follows:

Ozone: Though the SJVAPCD was initially classified as "Serious Nonattainment" for the 1997 8-hour ozone standard, EPA approved the reclassification to "Extreme Nonattainment" in the Federal Register on May 5, 2010 (effective June 4, 2010). The SJVAPCD is classified as being in "Nonattainment" under the State 8-hour standard, and "Severe Nonattainment" under the California Clean Air Act 1-hour standard. An Ozone Attainment Demonstration Plan (OADP) has been prepared, identifying emission reductions and additional air pollution control rules needed to attain the air quality standard by 2023.

Particulate matter: There are two regulated categories of this pollutant: PM10, consisting of particles less than 10 microns in diameter, and PM2.5, composed of particles less than 2.5 microns in size. On September 25, 2008, EPA re-designated the San Joaquin Valley to "Attainment" for the PM10 federal standard and approved the PM10 Maintenance Plan. The SJVAPCD has been classified as being in "Nonattainment" for the 1997 federal PM2.5 standard and for the State PM2.5 standard. A PM2.5 attainment demonstration plan for the federal 1997 PM2.5 standard has been adopted by the SJVAPCD and approved by the CARB, and forwarded to the EPA for approval. The SJVAPCD has been classified under the federal 2006 PM2.5 standard as "Nonattainment."

Carbon monoxide (CO): "Attainment" classification by EPA and CARB; however, the Fresno Urbanized Area was previously in "Nonattainment" and continues to be monitored for maintenance of attainment status.

Nitrogen Oxides (NOx): "Attainment" rating by EPA and "Attainment" by CARB. However, NOx is recognized and regulated as a major photochemical precursor for ozone/oxidant and particulate matter pollution.

Sulfur Oxides (SOX): "Attainment": rating by EPA and "Attainment" by CARB. However, SOX is recognized and regulated as a photochemical precursor to ozone/oxidant and particulate matter pollution.

Sulfates: No adopted federal standard; "Attainment" classification by CARB.

Particulate Lead: No federal classification/designation; "Attainment" classification by CARB.

Hydrogen sulfide (H2S): No adopted federal standard; "Unclassified" rating by CARB.

Visibility Reducing Particles: No adopted federal standard; "Unclassified" rating by CARB.

Vinyl Chloride: No adopted federal standard; "Attainment" classification by CARB. As a hazardous air pollutant and a type of reactive organic gas, generators of significant levels of vinyl chloride would be regulated through SJVAPCD permitting rules and reductions in its emissions would be sought through attainment plans for oxidants/ozone and particulate matter.

Exceedances of ozone/oxidant standards set by the EPA and CARB primarily occur during summer months, caused by the effect of heat and sunlight on ozone precursors such as reactive organic gases (ROG) and

nitrates of oxygen (NOx). ROG and NOx are typically formed and by combustion of fossil fuels in internal combustion vehicle engines, heating appliances, etc.
Particulate matter exceedances may also be caused by photochemical reactions, but are also caused by direct emissions such as those from fireplace and agricultural waste wood burning, roadway tire wear, and fugitive dust (the effect of wind on open areas of disturbed soil, unpaved and dirty roadways). Despite the dry climate and potential for dust during the summer, particulate matter exceedances have occurred more often during winter months, attributable to residential wood burning and cotton plow-down activities. Residential wood burning has been partially curtailed by local building ordinances that prohibit fireplace and wood stove installation in new homes since the early part of this decade, and by wood burning control rules adopted by the SJVAPCD. Control efforts over the past decade have been alleviating particulate matter to the point where the SJVAPCD is in attainment of the Federal particulate matter standard.

The region's high incidence of asthma, particularly childhood asthma, is primarily attributed to ozone and particulate matter exceedances, but may also be in part due to the nature of the pollutants encountered in the Valley, such as defoliants and pollen associated with agricultural operations. Household exposures to tobacco smoke, allergens, and respiratory irritants are also being investigated as causal in the development of asthma.

In response to the San Joaquin Valley's chronic nonattainment status for ozone and particulate matter, the San Joaquin Valley Air Pollution Control District (SJVAPCD) has adopted air quality attainment plans. The SJVAPCD adopted an attainment plan for the federal PM2.5 standard in April of 2008. EPA released final designations for the 2006 PM2.5 standards in December 2008 (effective in 2009) designating the Valley as nonattainment for the 2006 PM2.5 standards. Air quality attainment and implementation plans are periodically adopted and updated in response to area needs and federal and state mandates. These attainment and implementation plans prepared in response to the federal Clean Air Act are also intended to fulfill requirements of the California Clean Air Act, with emphasis on meeting California ambient air quality standards.

The principal components of air quality attainment plans consist of data describing measured air pollutant and pollutant precursor levels in the affected region's atmosphere; a baseline emissions inventory for the region; descriptions of control measures that will reduce future emissions; a future emissions inventory that reflects decreases due to implementation of emissions controls as well as increases due to increased population; and the results from a photochemical analysis model relating emissions to ambient pollutant levels, demonstrating attainment of the appropriate standard at a future target date through adoption and amendment of SJVAPCD Rules and Regulations.

The SJVAPCD rulemaking process provides for public input and economic impact analysis and regulates consumer products and activities contributory to air pollution; permitting and enforcement activities conducted by the SJVAPCD; and public education campaigns. It is also the SJVAPCD's strategy to implement multiple tactics or control measures, focusing on not only specific pollutant sources, but on overall transportation planning—which relates to land use mix, funding for major roadway construction and facilitation of mass transit. Furthermore, SJVAPCD sponsors voluntary and incentive programs to provide for accelerated attainment.

The proposed project's construction will be regulated by SJVAPCD Rules and Regulations for demolition, grading, paving, mobile construction equipment, and architectural coatings (paint formulation). Voluntary and incentive-based air pollution control programs may also be involved in the construction

and use of this project, but were not included in this project analysis because specifics are not available at this stage of project analysis.

Discussion

a. Less than Significant Impact. The SJVAPCD has established a threshold of CEQA significance for criteria pollutant emissions based on District New Source Review (NSR) offset requirements for stationary sources. This threshold for Industrial Projects by Vehicle Trips is 1,506 trips/day (SJVAPCD SPAL 2016). The Producers Dairy Project will only result in the relocation of delivery trailers from the current staging area at G Street to the proposed project site at 450 E. Belmont Avenue and will not add any new delivery trailers to Producers Dairy's fleet. Additionally, as further discussed in Section 6.16 (Transportation and Traffic), the close proximity of the proposed project to the Producers Dairy production site at 144 E. Belmont Avenue will actually slightly reduce the distance traveled by Producers Dairy delivery trucks. The proposed project also is below the threshold for General Light Industry projects based on project size, as the threshold is 510,000 ft^2 (11.7 acres), and the entire project footprint is less than 80,000 ft^2 (1.83 acres) (SJVAPCD SPAL 2016). 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.

b. Less than Significant Impact. As discussed in Section A and with a review of section 7.13 of the SJVAPCD Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI), the project qualified for the Small Project Analysis Level as set forth by the SJVAPCD, and as such requires no further analysis in order to make a finding of less than significant air quality impacts (SJAVPCD 2016). Additionally, the project will follow all applicable Fresno General Plan and SJVAPCD rules and regulations during demolition, grading, and construction.

c. Less than Significant Impact. As discussed in Section A and B, and with a review of Section 7.14 of the SJAPCD GAMAQI, the project would not result in cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors).

d. Less than Significant Impact. Sensitive Receptors are people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling unit(s). Several dwelling units are located surrounding the project, but the project is not a Type A project that produces sources of air toxic emissions, such as gasoline dispensing facilities, asphalt batch plants, warehouse distribution centers, or new freeways. Therefore, the proposed project has a less than significant impact.

e. Less than Significant Impact. The SJVAPCD CEQA Guidelines state that the SJVAPCD Guidance for Assessing and Mitigating Air Quality Impacts identifies Table 6 – *Screening Levels for Potential Sources* as a screening tool for qualitatively assessing odor impacts from a proposed project's potential to adversely affect area receptors (SJVAPCD Guidance to Conduct Detailed Analysis for Assessing Odor Impacts, 2016). As the proposed project is not within the category of Facilities listed under Table 6 in the SJVAPCD GAMAQI (SJAPCD GAMAQI 2015), the proposed project is therefore screened as having a less than significant impact.

6.4 Biological Resources

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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 US 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 US Fish and Wildlife Service?	☐	☐	☐	☑
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☑
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of 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?	☐	☐	☐	☑

Environmental Evaluation

Environmental Setting

The proposed project is located entirely within urban/developed land located within the City of Fresno. 100 percent of the site has been disturbed by development in previous decades.

Discussion

a. No Impact. The proposed project is located entirely within an existing developed industrial site within a highly urbanized area. No candidate, sensitive, or special status species are expected to occur on the project site. Thus, no impacts to sensitive species would occur.

b. No Impact. Development of the proposed project would not impact 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 (CDFW) or US Fish and Wildlife Service (USFWS).

c. **No Impact.** No federal or state jurisdictional areas occur within the limits of construction and operation of the proposed project. Therefore, no impacts to federally protected wetlands (as defined by Section 404 of the Clean Water Act) would occur

d. **No Impact.** The project site is located in an urban area within the City of Fresno. The site is not within a designated preserve area, nor is it contiguous with a wildlife corridor. The proposed project would utilize existing roads and not require the expansion of widening of these roads. Therefore, no associated impacts would occur.

e. **No Impact.** The proposed project site is paved and landscaped. Trees within the project site consist of landscape trees along E. Belmont Ave. The City of Fresno does not have specific ordinances related to the protection of trees, although the Open Space Element of the General Plan directs the County to ensure landmark trees are preserved and the Scenic Highways Element requires County road improvement projects on scenic roads to preserve mature trees. The proposed project is not located on a scenic road and therefore, the policy related to mature trees would not be applicable. Nevertheless, the proposed project will not be removing any trees.

f. **No Impact.** The proposed project is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or a designated Significant Ecological Area. Therefore, the proposed project would not conflict with an adopted habitat plan.

6.5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
CULTRUAL RESOURCES – Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☑	☐	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	☐	☐	☐	☑
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☑
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☑

Environmental Evaluation

Environmental Setting

Fresno was found by the Central Pacific Railroad Company in 1872 by Leland J. Stanford who was the Company Director for the railroad. At the time the terrain of the town was mostly barren sand plains. Fresno was incorporated in 1885 and now the city is the fifth largest in the state of California. The proposed project is located within the Tower District, one of the historic neighborhoods in Fresno, centered on the historic Tower Theatre and located approximately 1 mile north of downtown Fresno.

Regulatory Setting

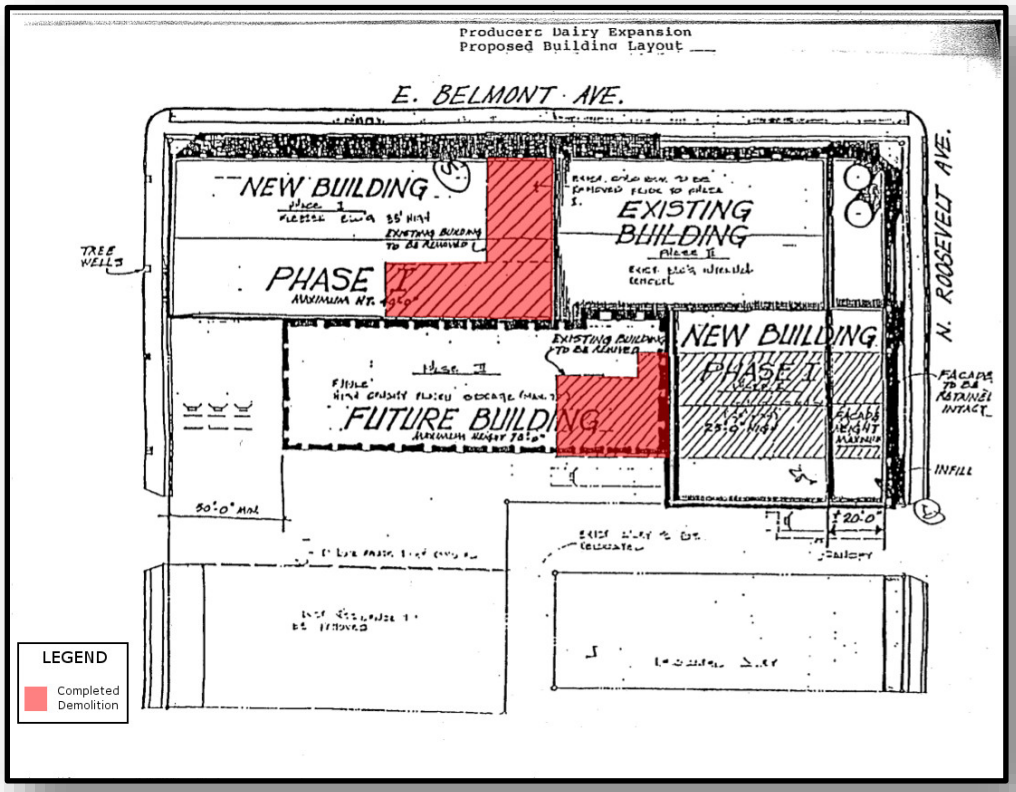
The City of Fresno has a Historic Preservation Ordinance that was approved by the City Council in 1979 and revised in 1999. The goal of the Ordinance is to "preserve, promote and improve the historic resources and districts of the City of Fresno for educational, cultural, economic and general welfare of the public" (Section 12-1600, Historic Preservation Ordinance). The City's Historic Preservation Ordinance requires the "regulation of exterior alterations visible from a public right-of-way including demolition, relocation and new construction, and interior alterations which would affect the significance of Historic Resources or Historic Districts" (Section 12-1606 (a)(2)). The City of Fresno Historic Preservation Commission prepared a report on December 14, 2015 in order to determine if the buildings on the project site were eligible for listing in the Local Register of Historic Resources (Appendix F). The report determined that "the original buildings meet the eligibility for the Local Register of Historic Resources under [Section 12-1607] Criteria iii as a rare expression in masonry brick of the Mission Revival style in Fresno" (Hattersley-Drayton 2015; Report to the Historic Preservation Commission). The report was presented to the Fresno City Council on February 25, 2016 and the City Council voted to deny the listing on the Local Register of Historic Resources.

The subject property consists of two brick buildings in the northwest corner of the approximately 1.83-acre property. Built between 1929 and 1932, the two brick buildings were used as dairy and ice cream factories until their disuse in 1986. The subject buildings are boarded up and have fallen into a state of disrepair. Partial demolition of the buildings occurred between 1990 and 1992 as part of a plan to renovate and expand on-site dairy factories

(Figure 15). By the mid-1990s, construction plans were halted and the project was never completed. These plans are reflected in the 1991 Tower District EIR to the Tower District Specific Plan. The current proposed project will demolish the remainder of these two buildings in order to expand delivery trailer parking spaces. The 1991 Tower District Specific Plan EIR contains nine mitigation measure including a measure to "retain the existing building at the southwest corner of East Belmont and North Roosevelt Avenues," currently identified as the north building at 450 E. Belmont Avenue (City of Fresno, 1991).

The purpose of the Cultural Resources section of this Initial Study is to conduct a preliminary review under CEQA that considers the application of the discretionary historical resources category and to determine the scope of the impact of the project upon the site buildings.

Figure 15 – Tower District Specific Plan EIR Site Plan



Discussion

a. Historical Resources - Potentially Significant Impact. CEQA states that a project would have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic resource. Therefore, an evaluation of project impacts under CEQA requires a two-part inquiry: (1) a determination of whether the project site contains or is adjacent to a historic resource or resources, and if so, (2) a determination of whether the proposed project will result in a "substantial adverse change" in the significance of the historical resource or resources. If the project site is determined to not contain a historical resource, then there does not need to be a determination if the proposed project will result in a "substantial adverse change" to the resources. CEQA §15064.5(a) defines a historical resource as: **(1)** Being a resource listed in or determined to be eligible

by the State Historical Resources Commission for listing in the California Register of Historical Resources, **(2)** being a resource included in a local register of historical resources or identified as significant in an historical resource survey, or **(3)** determined by a lead agency to be historically significant or significant in the architectural, engineering, scientific, economic, social, political, military, or cultural annals of California.

The subject buildings are discussed under each definition below:

(1) The subject buildings are not listed in the California Register of Historical Resources and have not been determined to be eligible for listing in the Register by the State Historical Resources Commission.

(2) The City of Fresno Historic Preservation Commission staff determined that "the original buildings meet the eligibility for the Local Register of Historic Resources under Criteria iii as a rare expression in masonry brick of the Mission Revival style in Fresno" (Hattersley-Drayton 2015; Report to the Historic Preservation Commission). The Fresno City Council denied the listing on February 25, 2016. However, based on the survey findings, the subject buildings **are** considered historical resources under CEQA Guidelines §15064.5(a)(2).

(3) CEQA §15064.5(a)(3) states that a resource **may** be considered by a lead agency to be a historical resource **if** it is determined by the lead agency to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, education, social, political, military, or cultural annals of California. The City of Fresno Historic Preservation Commission found the original buildings to be architecturally significant as "a rare expression in masonry brick of the Mission Revival style in Fresno" (Hattersley-Drayton 2015; Report to the Historic Preservation Commission). Based on the findings of the Fresno Historic Preservation Commission and the 1991 Tower District Specific Plan mitigation measures calling for the preservation of the north building, the subject buildings on the project site should therefore be considered historical resources for the purposes of CEQA.

Integrity/ Impact Analysis:

Mission Revival Architecture

The Mission Revival style, a Hispanic heritage inspiration, was first introduced in California during the late 19th century (1890s). Following the end of World War 1 (1918), the Mission Revival style slowly faded from view. During the height of its popularity, Mission Revival architecture was adopted by railroad companies and hotels for their centerpiece buildings (e.g. Santa Fe Passenger Depot in Fresno, CA built in 1896). The character-defining features of the Mission Revival style are:

1. smooth stucco-finished exterior walls;
2. arched doorways and windows;
3. arcaded walk-ways with large piers;
4. multi-curved parapets;
5. mission-tile clad roofs and ridges;
6. low-pitched hipped roofs;
7. wide open eaves with a significant overhang;
8. roof or wall dormers;
9. roof drainage provided by waterspouts (canals) that pierce the walls;
10. decorative tile;
11. rectangular sash windows with fixed lights;

12. quatrefoil patterns;
13. recessed main entry door;
14. bell towers; and
15. cantilevered roofs (Harris 2003: 216).

Local examples of the Mission Revival style include the Tinkler building at 475 N. Broadway Street and the First Mexican Baptist Church at 1061 E Street. Listed on the Fresno Local Register of Historical Resources, both buildings illustrate many of the Mission Revival style character-defining features. The First Mexican Baptist Church serves as a good example of the Mission Revival style applied to a brick building **(Figure 16)**.

Figure 16 – First Mexican Baptist Church Building (Mission Revival)

North Building Description

The Report to the Historic Preservation Commission described the north building as:

> "The vacant Milk Bottling Plant is a 1-2 brick masonry complex designed in a Mission Revival style. The 18,008-sf building is located on the southwest corner of N. Roosevelt and E. Belmont Avenues. The oldest part of the building is two bays, one story and wraps the corner with what was once a store entrance on the diagonal and a former office (with signage "Central Valley Cheese") facing onto Roosevelt. The store entrance is solid wood with sidelights and a transom that have been in-filled. Directly above the door is a diamond pattern of brick created by alternating traditional red with darker/burned bricks (see photo on

continuation sheet). The entrance is further demarcated by two engaged piers topped by a flat capital and a rounded cornice with a coping of brick. Two decorative tiled roof visors cantilever out on either side of this entrance and are supported by decorative wood brackets. Directly beneath the Roosevelt Avenue roof visor is a large window piercing and transom, now boarded. The former office bay faces Roosevelt and has a curvilinear parapet with brick coping. A boarded entrance offset to the south and five boarded windows with heavy brick lugsills are located on this elevation. A second story is set back from the Roosevelt Avenue elevation and features a prominent *espadaña* (curvilinear parapet) painted out in white. A circle on the center of the parapet is empty but may once have included a terra cotta ornament or emblem for the business. The north and south elevations of the complex are reinforced with stout pier buttresses of brick. A hefty bond beam runs along the Belmont Street façade. The rear of this building has cement cladding with a deep open section on the south corner for loading. A faded sign, "Central Valley Cheese" is still visible." (Hattersley-Drayton 2015; Report to the Historic Preservation Commission).

South Building Description

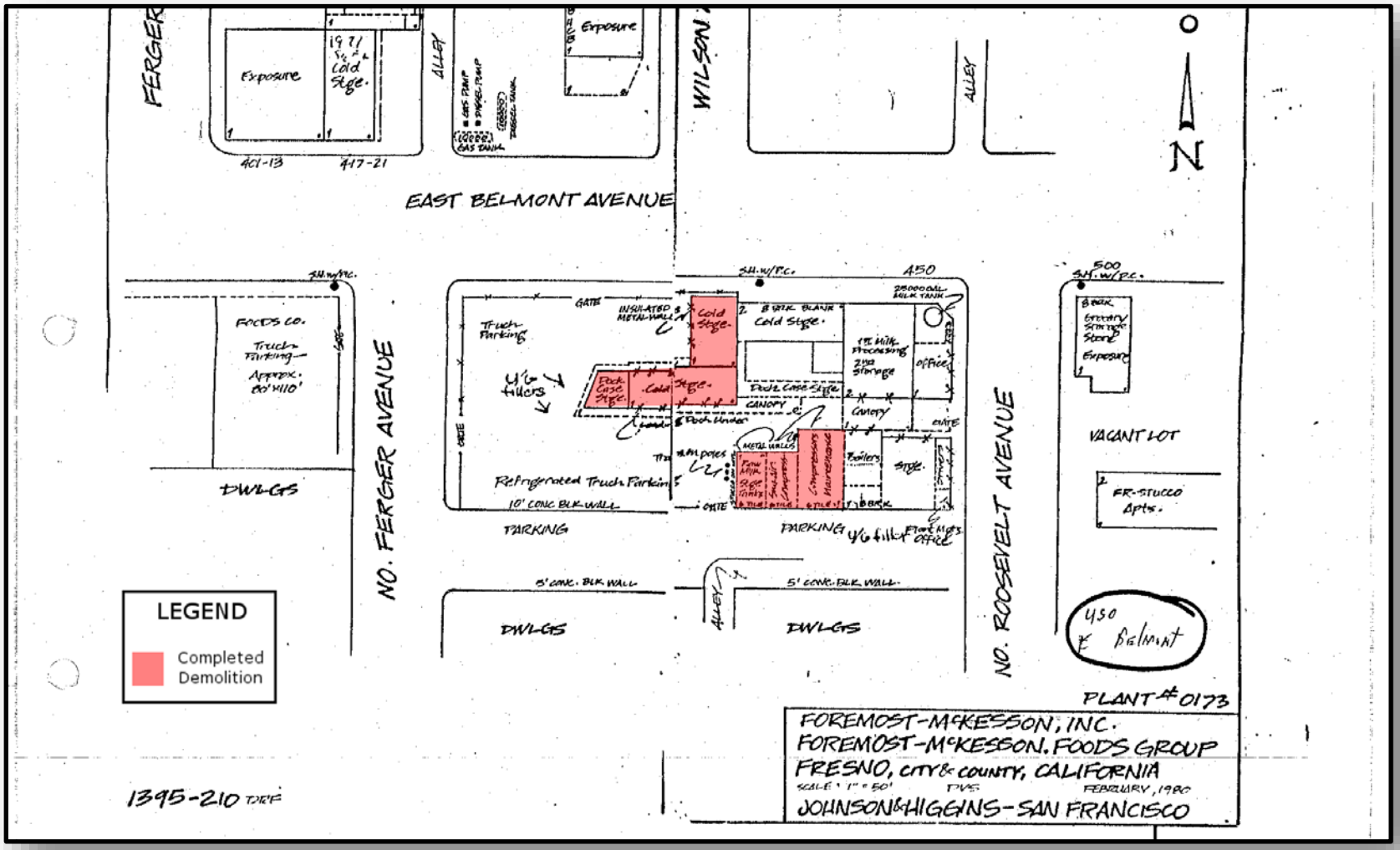
The Report to the Historic Preservation Commission described the south building as:

"To the south of the former Milk Bottling Building is a 1-2 story complex of nominally rectangular plan which is identified on early Sanborn maps as an Ice Cream Factory. The masonry brick structure is also designed in a simple Mission Revival style with an *espadaña* along the principle elevation and dark brick coping along the parapet, the window openings and the façade sign, now faded "Golden State Company Ice Creamery." The building's south elevation is plain with no windows or doors. The north elevation steps back to include a large opening for loading. A thick wood cornice cantilevers out from this wall. Four large windows are located on the façade; these are all in-filled with plywood. A single door is located on the south end of this elevation." (Hattersley-Drayton 2015; Report to the Historic Preservation Commission).

Alterations of North and South Buildings

The two buildings on the project site have already been partially demolished according to aerial maps, historical site plans, and site photos.

Figure 17 – 1980's Site Plan
(Demolition showed in red)



In the 1980 site map above **(Figure 17)**, obtained from Fresno County Health Department Records, the red portions have been added to show where there used to be a dock case storage, two sections of the cold storage with a canopy attached to the north building. Half of the south building has been removed which included the compressors maintenance. As discussed in Section 2.2 of this Initial Study, demolition was performed in 1991 in accordance with the approved site plan located in the Tower District Specific Plan EIR **(Figure 15)** as part of a plan to construct new factory buildings on the site.

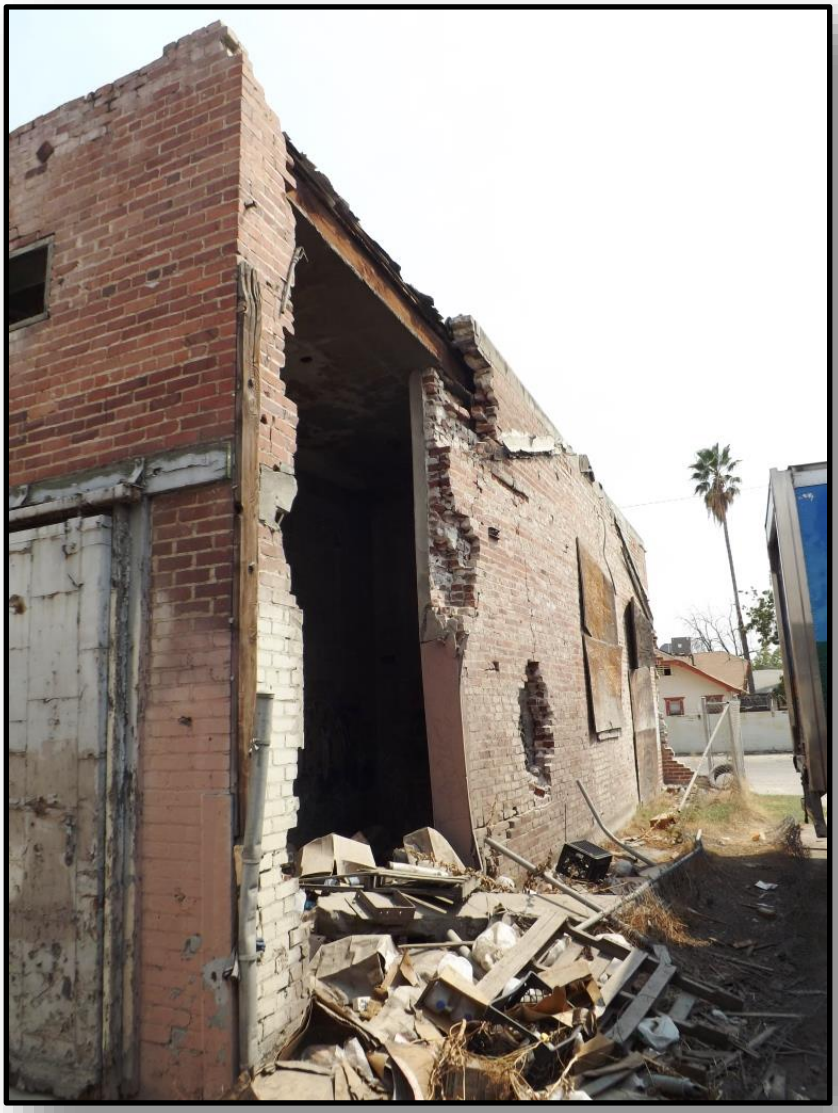
Figure 18 – South Building Demolition

In the photo above **(Figure 18)**, the west façade of the south building was partially demolished on October 23, 1991 as part of an underground storage tank removal. The photo was obtained from the Underground Storage Tank file #FA0169112 with the Fresno County Health Department.

Figure 19 – South Building West Face

In the photo above **(Figure 19)**, the southwest corner of the south building displays a partial demolished wall and a large hole on the northern half of the west façade.

Figure 20 – South Building West Face 2



Above **(Figure 20)** is the close up view of west façade of the south building that shows the former entry way to the rest of the south building (now demolished).

Figure 21 – North Building West Face

In the photo above **(Figure 21)**, immediately above the pillar is a horizontal line stretching across the building where there used to be an attachment to the rest of the north building, which is indicated as cold storage in the 1980 site plans **(Figure 17)**.

Figure 22 – North Building Posterior (West Face) Close-up

The photo above **(Figure 22)** is a close up view of where the former cold storage section of the North building used to connect to the rest of the North building on the west side.

Review of Significance

As stated previously in this section, the City of Fresno Historic Preservation Commission found the original buildings to be architecturally significant as "a rare expression in masonry brick of the Mission Revival style in Fresno" (Hattersley-Drayton 2015; Report to the Historic Preservation Commission). The report found these two buildings to be significant due their attributes of the Mission Revival style, specifically the three curved roof parapets and the cantilevered roof on the northeast corner of the north building.

The south building only contains one of the fifteen attributes of the Mission Revival style - the curved roof parapet **(Figure 23)**. The large building only contains two attributes of the Mission Revival style – two curved roof parapets (a small brick parapet and a large white parapet) and one cantilevered roof with red Spanish tile **(Figure 24)**. The curved roof parapet is one of the most common and defining characteristics of the Mission Revival style. These two attributes are the defining architectural characteristics of the buildings on the project site at 450 E. Belmont Avenue.

Figure 23 – Curved Parapet, South Building

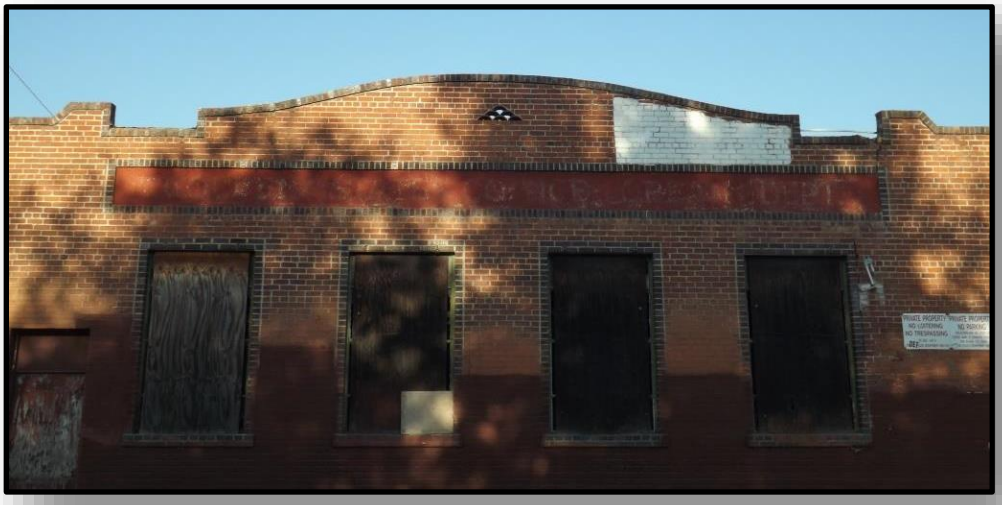


Figure 24 – Curved Parapets and Cantilevered Roof, North Building

Integrity

In a cultural resource analysis, integrity is the ability of the property to convey the "quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting,

materials, workmanship, feeling and association" (Nation Register Bulletin No. 15, 2002). As described below, the significance of the two buildings has been reduced by the changes to the surrounding environment since the 1930s and partial demolition of the buildings. The report to the Historic Preservation Commission states that "although windows are boarded and some architectural treatment on the former 1929 corner building has been removed, the integrity of the buildings remains high." The integrity of the two brick masonry buildings does convey their historical significance. However, the staff report did not account for the fact that both buildings have been already partially modified/demolished, which slightly lowers the integrity of their architectural significance. The integrity of the north building largely remains intact, because the partial demolition removed a later cold storage addition to the western face of the building. Therefore, the north building is able to still convey its architectural significance. The integrity of the south building has been significantly compromised due to its entire eastern half being demolished in 1991. However, due the south building retaining the east façade with the Mission Revival style attributes, the south building is still able to convey some of its architectural significance.

Impact

Given that both buildings have been partially demolished, (the north building reduced by one-third and the south building by one-half), their historical integrity has been partially compromised. The complete demolition of these buildings would cause the removal of their Mission Revival style attributes, and therefore could still be considered a substantial adverse change to the significance of these historical resources as defined in CEQA §15064.5. Therefore, this action could be considered a potentially significant impact and would require further analysis in an EIR. The project site was already analyzed in the 1991 Tower District FEIR and any analysis would need to be a Supplement to that EIR.

Given the structurally unsound nature of the two buildings as well as the potential financial infeasibility of refurbishing the buildings as discussed in Section 3.4, implementation of the 1991 Tower District Specific Plan EIR mitigation measures calling for the preservation of the north building are infeasible and a Supplemental EIR should be prepared to address the 1991 FEIR mitigation measures.

The goal of the following mitigation measures is to help minimize and reduce some of the project's effects on the historical resources, though the mitigation measures are not expected to reduce the impact to a less than significant level. These mitigation measures will be further discussed in the Supplemental EIR.

Mitigation Measures:

Mitigation Measures CUL 1:

The Proposed Project will include an installation of a commemorative monument with a plaque explaining the history of the buildings on the property, the character-defining features of the Mission Revival style and the importance of the style within the City of Fresno. The monument will be located on the east side of the site on N. Roosevelt Avenue entrance. In addition to this, the measurements are a 2'-6" base foundation with an 8'-0" long x 5'-0" high x 6" thick wall. Brick from the existing buildings shall be incorporated into the construction of the commemorative monument. Efforts will be taken in designing the commemorative monument to incorporate the curved parapet of the Mission Revival style currently present in the North building.

Mitigation Measure CUL 2:
The proposed project will include an installation of a sound wall. The wall will be along the southwest, southern and southeast border of the property. If feasible, brick from the existing buildings shall be incorporated into the wall. This work will require some demolition of an existing concrete masonry wall on the southern boundary.

Mitigation Measure CUL 3:
Retain a photographer qualified in large format architectural photography to perform a photo-documentation of the north building. Any photo documentation would then be recorded with a local library.

Mitigation Measure CUL 4:
Any potential future buildings constructed on this site shall be designed with a curved parapet and cantilevered Spanish tile overhang to mimic the current architectural style of the current buildings.

Mitigation Measure CUL 5:
Salvage building materials to be reused for educational purposes or to be incorporated into other buildings through donation of materials to interested local government entities.

Mitigation Measure CUL 6:
Install a decorative iron fence with brick pilasters of appropriate spacing along the northwest, north, and northeast boundaries of the project site. If feasible, brick from the existing buildings will be incorporated into the pilasters.

b. Archaeological Resources - No Impact. 2,370 cubic yards of earth-moving activity is proposed as part of the project. The only earth-moving activity to be conducted on the project will be:

b.1. Removing existing paving and subgrade to an approximate depth of 1 foot and
b.2. Placing 18-inch diameter by 7-feet deep caissons for the sound wall foundation system.

Given that the entire property has already been disturbed during its history, the plausibility of it affecting any archaeological resources is minimal.

c. Paleontological Resources - No Impact. Given the fact that the entire property has already been disturbed during its history, the plausibility of it affecting any paleontological resources is minimal.

d. Human Remains - No Impact. Given the fact that the entire property has already been disturbed during its history, the plausibility of it affecting any human remains is minimal.

6.6 Greenhouse Gases

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
GREENHOUSE GASES – Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☑	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☑	☐

Environmental Evaluation

Discussion

Greenhouse Gases (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in in the atmosphere and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that there is a direct link between increased emission of GHGs and long-term global temperature. What GHGs have in common is that they allow sunlight to enter the atmosphere, but trap a portion of the outward-bound infrared radiation and warm up the air. The process is similar to the effect greenhouses have in raising the internal temperature, hence the name greenhouse gases. Both natural processes and human activities emit GHGs. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature; however, emissions from human activities such as electricity generation and motor vehicle operations have elevated the concentration of GHGs in the atmosphere. This accumulation of GHGs has contributed to an increase in the temperature of the earth's atmosphere and contributed to global climate change.

The principal GHGs are carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), sulfur hexafluoride (SF6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H2O). CO2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO2 equivalents (CO2e).

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which statewide emission of GHG would be progressively reduced, as follows:

- By 2010, reduce greenhouse gas emission to 2000 levels;
- By 2020, reduce greenhouse gas emission to 1990 levels; and
- By 2050, reduce greenhouse gas emissions to 80 percent below 1990 levels.

In response to Executive Order S-3-05, the Secretary of Cal/EPA created the Climate Action Team (CAT), which, in March 2006, published the Climate Action Team Report to Governor Schwarzenegger and the Legislature (2006 CAT Report). The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce climate change greenhouse gas emissions. These are strategies that could

be implemented by various state agencies to ensure that the Governor's targets are met and can be met with existing authority of the state agencies.

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Section 38500, et seq., or AB 32), which requires the California Air Resources Board (ARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020.

As a central requirement of AB 32, the ARB was assigned the task of developing a Climate Change Scoping Plan that outlines the state's strategy to achieve the 2020 GHG emissions limits. This Scoping Plan, which was developed by the ARB in coordination with the CAT, includes a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the state's dependence on oil, diversify the state's energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-and-trade program covering 85 percent of the state's emissions. Additional key recommendations of the Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards; increases in the amount of clean and renewable energy used to power the state; and implementation of a low-carbon fuel standard that will make the fuels used in the state cleaner. Furthermore, the Scoping Plan also proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emission from trucks and from ships docked in California ports. The Climate Change Scoping Plan was approved by the ARB on December 22, 2008. According to the September 23, 2010 AB 32 Climate Change Scoping Plan Progress Report, 40 percent of the reductions identified in the Scoping Plan have been secured through ARB actions and California is on track to its 2020 goal.

Although not originally intended to reduce GHGs, California Code of Regulations (CCR) Title 24, Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with recognition that energy-efficient buildings require less electricity and reduce fuel consumption, which in turn decreased GHG emissions. The current 2010 Tile 24 standards were adopted to respond, amongst other reasons, to the requirements of AB 32. Specifically, new development projects within California after January 1, 2011 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11).

a. Less than Significant. The proposed project would result in short-term emissions of GHGs during demolition/construction. These emissions, primarily carbon dioxide (CO2), methane (CH4), and nitrous oxide (N2O), are the result of fuel combustion by construction equipment and motor vehicles. The other primary GHGs (hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) are typically associated with specific industrial sources and are not expected to be emitted by the proposed project. As described in the air quality section, the use of heavy-duty construction equipment would be very limited. Therefore, the emissions of CO2 from construction would be minimal.

The project would also result in direct annual emissions of GHGs during operation. Direct emissions of GHG from operation of the proposed project are primarily due to fuel consumption in the delivery trucks used for Producers Dairy. The project would not result in emissions of GHG from any other

sources. As further noted in Section 6.16 (Transportation and Traffic) of this Initial Study, delivery trailer truck trips will be greatly reduced by a total of 2.7 miles for each trip due to the relocating of the staging area from 1762 G Street to 450 E. Belmont Ave, which will relocate the staging area much closer to both the production facility at 144 E. Belmont and the North/South freeway onramps at E. Belmont Avenue and Highway 99. This reduces Vehicle Miles Travel (VMT) by 66 percent- far below the SJVAPCD's threshold of reducing greenhouse gas emissions by 29 percent below the "Business as Usual" baseline.

b. Less than Significant. See item a. for details.

6.7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
GEOLOGY AND SOILS – Would the project:				
a. Expose people or structures to 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?	☐	☐	☐	☑
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. 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?	☐	☐	☐	☑

Environmental Evaluation

Environmental Setting

The project is in the Central Valley of California, which is in the Great Valley Geomorphic and Physiographic Province (CGS 2002). The Central Valley is a large, nearly flat valley bound by the Klamath and Trinity mountains to the north, the southern Cascade Range and Sierra Nevada to the east, the San Emigdio and Tehachapi mountains to the south, and the Coast Ranges and San Francisco Bay to the west. The Central Valley consists of the Sacramento Valley in the north and the San Joaquin Valley in the south.

The Central Valley occupies a structural trough created about 65 million years ago by collision of the Pacific and North American tectonic plates. Sediment from ocean water, river deposition, and glacial deposition filled the trough with an approximately 6-mile-thick layer of continental and marine sediments above rock (Authority and FRA 2004). The study area is located in the central part of the San Joaquin Valley. The topography in this part of the Central Valley is flat-lying, with elevations ranging between +395 feet (North American Vertical Datum of 1988 [NAVD 88]) to +205 feet (NAVD 88). A general downward gradient occurs in the study area to the west-southwest, determined principally by the gentle slope of the vast alluvial fans extending from the Sierra Nevada in the east to the center of the San Joaquin Valley.

Discussion

a. No Impact. No active earthquake faults or Alquist-Priolo Special Fault Study zones are identified in the Fresno metropolitan area. However, the proposed project would be subject to seismic ground shaking from fault systems in the region. The proposed project is in a topographically flat area that is not subject to landslide hazard, and the well-drained alluvial soils that underlie the City present minimal potential for liquefaction during earthquakes. The proposed project does not include the development of structures other than a security fence, sound wall, and small commemorative monument, and therefore would not expose any structures to risk of loss. In addition, the proposed project would only serve the existing population and therefore, would not expose any people to any additional risk. Through the removal of the two brick buildings built in the late 1920's/early 1930's, the project would actually reduce the risk towards the existing population. Therefore, no impact related to seismic events would occur with implementation of the project.

b. No Impact. The proposed project is located in an urbanized area with few areas of exposed soil that could be subject to erosion. Project construction would occur almost exclusively within the already developed property boundary and would require little ground disturbance, therefore soil erosion would not be expected to occur.

c. No Impact. As discussed above, the soils underlying the project area are well-drained alluvial soils that present minimal potential for liquefaction or geologic instability. Therefore, the proposed project would not be located on an unstable geologic unit.

d. No Impact. Expansive soils are present in the project area. However, the proposed project does not include the construction of residential or commercial structures that could be subject to hazards related to such soils. No impact would occur.

e. No Impact. No wastewater disposal system involving the use of septic tanks, leach fields, or alternative sewage disposal systems that depend upon appropriate soil regimes are currently in use at the project site. No associated impacts from wastewater disposal systems would occur.

6.8 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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?	☐	☐	☐	☑
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 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. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☑
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☑
h. Expose people or structures to a significant risk of loss, injury, or death involving wild land fires, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands?	☐	☐	☐	☑

Environmental Evaluation

Environmental Setting

Hazardous materials, as defined by the California Code of Regulations, are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Hazardous materials are grouped into the following four categories, based on their properties:

- Toxic – causes human health effects;
- Ignitable – has the ability to burn;
- Corrosive – causes severe burns or damage to materials; and
- Reactive – causes explosions or generates toxic gases.

A hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. The criteria that define a material as hazardous also define a waste of that material as hazardous. If improperly handled, hazardous materials and hazardous waste can result in public health hazards if released into the soil or groundwater or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous constituents higher than specific regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer. The California Code of Regulations, Title 22, Sections 66261.20-24 contain technical descriptions of toxic characteristics that could cause soil or groundwater to be classified as hazardous waste.

Phase I Environmental Site Assessment (ESA)

A Phase I ESA was prepared by Soar Environmental Consulting, Inc. in 2016 for the entire 1.83-acre property to determine the presence or absence of hazardous materials (Appendix B). The Phase I ESA discovered no evidence of recognized environmental conditions or significant environmental concerns in connection with the subject property.

Asbestos Survey, Lead-Based Paint and PCB Inspection Report

Given the age of the buildings on the proposed project proposed for demolition, an Asbestos Survey, Lead-Based Paint & PCB Inspection Report was prepared by T. Brooks & Associates on January 19, 2016 (T. Brooks & Associates 2016) (Appendix C). The report found evidence of lead-based paint and asbestos, and concluded that light ballast within the north building likely contained PCB. The proposed project demolition will follow all applicable requirements for the removal of potential hazardous substances on the property in accordance with the report recommendations.

Discussion

a. No Impact. The proposed project does not include the routine transport, use, or disposal of hazardous materials and will not create a significant hazard to the public or the environment.

b. Less than Significant Impacts. The proposed project will not 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. The proposed project demolition will follow all applicable requirements for the removal of any potential hazardous substances during demolition on the property in accordance with the Asbestos Survey, Lead-Based Paint, and PCB report recommendations (Appendix C).

c. No Impact. The closest school, Muir Elementary, is 0.26 miles away and therefore not within 0.25 miles of the project site.

d. No Impact. The proposed project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5.

e. No Impact. The proposed project is 1.5 miles from Chandler Airport, which is owned by the City of Fresno and is a public use airport. The project is not within the airport traffic pattern zone. The tallest building on the site is less than 60 feet high and the project would not pose a safety hazard for people residing or working within the project area.

f. No Impact. The proposed project is more than 10 miles away from the closest private airstrip.

g. No Impact. The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

h. No Impact. The proposed project is located in a developed, institutional/commercial/residential area. No wildlands are located in the project vicinity. Therefore, no impacts related to wildland fires would occur.

6.9 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
HYDROLOGY AND WATER QUALITY – Would the project:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☑	☐
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☑	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	☐	☐	☑	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?	☐	☐	☐	☑
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☑	☐
f. Otherwise substantially degrade water quality?	☐	☐	☐	☑
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☑
h. Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	☐	☐	☑	☐
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☑
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☑

Environmental Evaluation

Environmental Setting

Regional Setting

The San Joaquin Valley is surrounded on the west by the Coast Ranges, on the south by the San Emigdio and Tehachapi mountains, on the east by the Sierra Nevada Mountains, and on the north by the Sacramento-San Joaquin Delta and Sacramento Valley. The northern portion of the San Joaquin Valley

drains toward the Delta by the San Joaquin River and its tributaries—the Fresno, Merced, Tuolumne, and Stanislaus rivers. The southern portion of the valley is internally drained by the Kings, Kaweah, Tule, and Kern rivers, which flow into the Tulare drainage basin, including the beds of the former Tulare, Buena Vista, and Kern lakes.

Surface Water Bodies

San Joaquin River

The San Joaquin River, 330 miles long, is the second-longest river in California and drains 32,000 square miles of the San Joaquin Valley. The river originates high on the western slopes of the Sierra Nevada and drains most of the area from the southern border of Yosemite National Park, south to Kings Canyon National Park. The San Joaquin River has eight major tributaries, including the Stanislaus River, Tuolumne River, Merced River, Calaveras River, and Mokelumne River. The San Joaquin River is listed on the 303(d) List of Impaired Water Bodies.

Drainage

Stormwater runoff is collected and disposed of through an integrated system of curbside gutters, underground pipelines, drainage ditches, and creeks. Fresno Metropolitan Flood Control District (FMFCD)'s stormwater system incorporates detention facilities that minimize potential downstream impacts such as erosion or flooding.

The project site lies within Drainage Area "RR," which drains to a 3.6 -acre recharge basin at W. Belmont Avenue and N. Wesley Avenue.

Groundwater

The City of Fresno obtains the majority of its delivered water supply from its groundwater sources. A portion of this water, which is gradually increasing as the City annexes agricultural lands that were provided surface water from the Fresno Irrigation District, comes from surface water contractual allocation from the Kings River. The City lies within the Kings Subbasin of the San Joaquin Valley Groundwater Basin of the Tulare Lake Hydrologic Region. The following description of the Kings Subbasin was obtained from California Department of Water Resources Bulletin 118.

The surface area of the Kings Subbasin encompasses 1,530 square miles in Fresno, Kings, and Tulare counties. The Kings Subbasin is bounded on the north by the San Joaquin River. The northwestern corner of the subbasin is formed by the intersection of the east line of the Farmers Water District with the San Joaquin River. The western boundary of the Kings Subbasin comprises the eastern boundaries of the Delta- Mendota and Westside subbasins. The southern boundary runs easterly along the northern boundary of the Empire West Side Irrigation District, the southern fork of the Kings River, the southern boundary of Laguna Irrigation District, the northern boundary of the Kings County Water District, the southern boundaries of Consolidated and Alta Irrigation Districts, and the western boundary of Stone Corral Irrigation District. The eastern boundary of the subbasin is the alluvium-granitic rock interface of the Sierra Nevada foothills.

Groundwater flow is generally to the southwest. Two notable groundwater depressions exist. One is centered in Fresno-Clovis urban area. The other is centered approximately 20 miles southwest of Fresno in the Raisin City Water District.

Depth to groundwater in the project vicinity is approximately 105 to 145 feet below ground surface. Groundwater storage was estimated at 93 million acre-feet in 1961, with water located at depths of 1,000 feet or less.

The groundwater is predominantly of bicarbonate type. The major cations are calcium, magnesium, and sodium. Sodium appears higher in the western portion of the subbasin, where some chloride waters are also found.

Dibromochloropropane (DBCP), a soil fumigant nematicide, and nitrates can be found in groundwater along the eastern side of the subbasin. Shallow brackish groundwater can be found along the western portion of the subbasin. Elevated concentrations of fluoride, boron, and sodium can be found in localized areas of the subbasin.

All of the major public water purveyors that rely on Kings Subbasin groundwater have adopted Assembly Bill 3030 groundwater management plans. This includes the Alta Irrigation District, Consolidated Irrigation District, County of Fresno, Fresno Irrigation District, James Irrigation District, Kings River Conservation District, Kings River Water District, Liberty Canal Company, Liberty Water District, Liberty Mill Race Company, Mid Valley Water District, Orange Cove Irrigation District, Raisin City Water District, and Riverdale Irrigation District.

Discussion

a. Less than Significant Impact. Potential water quality impacts associated with the proposed project would include short-term construction-related erosion/sedimentation and long-term operational storm water discharge. The short-term water quality impacts related to erosion/sedimentation would be less than significant based on conformance with existing regulatory requirements (i.e., acquisition of an NPDES General Construction Activity Storm Water Permit and implementation of a SWPPP).

Due to the primary use of the site as delivery trailer parking, long-term water quality impacts associated with the project would include generation of minor quantities of urban contaminants, such as petroleum compounds, metals, and other types of contaminants that typically accumulate on roadways. Long-term water quality impacts would be addressed through compliance with NPDES guidelines for municipal storm water runoff in accordance with requirement of the Central Valley Regional Water Quality Control Board (RWQCB). The RWQCB requires that pollutant discharges and runoff from development are reduced to the maximum extent practicable and that receiving water quality objectives are not violated throughout the life of the project through implementation of source control and structural post-construction BMPs. Implementation of required BMPs would ensure that long-term water quality impacts associated with the proposed project would be less than significant.

b. Less than Significant Impact. The project does not propose the use of groundwater. The project is mostly covered with impervious surfaces that have low absorption rates. Approximately 0.4 acres (APN 459-032-15 and -05) of the site is currently dirt and would be paved over. Considering less than 1 acre of soil will be paved over, the impact the refresh rate of the local groundwater table will be less than significant.

c. Less than Significant Impact. September 1, 2016 written correspondence with the California RWQCB, Central Valley Region determined that the paving of approximately 0.4 acres of dirt lot would not be considered a significant impact for altering the existing drainage of the site (Appendix D).

d. No Impact. The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

e. Less than Significant Impact. As the proposed project is paving over less than 1 acre of dirt, the project is below the notification requirements as set by the Fresno Metropolitan Flood Control District (FMFCD 2016). Therefore, the project has a less than significant impact.

f. No Impact. The proposed project site is already fully developed and the proposed project would not otherwise substantially degrade water quality.

g. No Impact. The proposed project is within 100-year flood plain, but does not include the construction of any dwelling units.

h. Less than Significant. The proposed project is within a 100-year flood plain, but will not place any structures that will impede or redirect flood flows.

i. No Impact. The proposed project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

j. No Impact. The proposed project is on flat terrain over 20 miles from any lakes or oceans, and would not be at risk from a seiche, tsunami, or mudflow.

6.10 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
LAND USE AND PLANNING – Would the project:				
a. Physically divide an established community?	☐	☐	☐	☑
b. Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☑	☐	☐
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☑

Environmental Evaluation

Environmental Setting

The proposed project is located within the Tower District Specific Plan, and consists of three separate parcels, APN 459-032-23, 459-032-15, and 459-032-05. The proposed project is filed with the City of Fresno under Development Permit No. D-16-088. The site is currently zoned Light Industrial. The project's designated land use within the City of Fresno General Plan is Light Industry.

Historical Land Use

The two industrial buildings on the site were first constructed in 1929 according to a December 14, 2015 report prepared by the City of Fresno Historic Preservation Commission staff (Hattersley-Drayton 2015). The two small dirt lots (APN 459-032-15, and 459-032-05) were originally residential lots. According to historical aerial photo research conducted as part of the Phase I ESA, a house was constructed on each lot sometime between 1920 and 1948, and each were demolished sometime between the years of 1950 and 1960. The property was owned and operated by KF Foods until its bankruptcy in 1986. The property was then purchased by Producers Dairy sometime between 1986 and 1988. Following acquisition by Producers Dairy, the project site was rezoned in 1991 from general commercial for lot APN 459-032-23, and medium high density residential for the small dirt lots (APN 459-032-15, and 459-032-05) to light industrial with related rezoning from C-6 and R-3 to C-M. This was conducted under Rezoning Application No. R-90-49 and Fresno-High Roeding Community Plan Amendment No. A-90-24. This rezoning action was evaluated under CEQA in an Initial Study (Environmental Assessment Number A-90-24/R-90-49) performed by the City of Fresno and published on October 1, 1990 with a Negative Declaration. The project proposed at the time was to retain the North Building, retain the façade of the South building, and build two new buildings on the site for dairy industrial purposes **(Figure 15)**. This Environmental Assessment and Rezoning Application predates the 1991 Tower District Specific Plan.

Statement of Covenants Affecting Land Development

As part of Rezoning Application R-90-49, a Statement of Covenants Affecting Land Development was drafted on December 19, 1990, and recorded with the Fresno County Recorder on January 28, 1993. The Statement of Covenants contained the following covenants (Appendix E):

A. The project shall retain the existing building at the southwest corner of East Belmont and North Roosevelt Avenues as depicted on attached Exhibit "L-1".

B. Retention and renovation of the facade of the existing building immediately south of the building at the southwest corner, as shown on Exhibit "L-1", as is physically possible and economically practical. If the facade fails, due to structural distress, it should be rebuilt to resemble the existing historical structure as closely as possible using the remnant bricks from the fallen facade. All precautions in concert with common practices standard to the industry shall be taken to save the facade intact. However, no implicit guarantee can be given that the facade will not fail during the demolition and renovation process.

C. The new construction in the infill areas on the east - side of the property shall be compatible with the existing structure as shown on Exhibit "L-2".

D. The new construction contemplated immediately west of the facade described above shall be no higher than the height of the facade for a minimum of twenty feet west of the facade.

E. The new building to be constructed immediately west of the 30' existing building at the northwest corner of the site as shown on Exhibit "L-1" shall be of a height equal to or slightly greater than the westerly portion of said building, but in no case higher than forty feet and shall be compatible with the existing structure to the east as shown on Exhibit "L-2".

F. The owner shall provide and maintain street trees in tree wells in the sidewalk on the west side of the property south to the entry driveway. These trees and major trees planted along the remainder of the west and south sides of the property shall be a species that attain a minimum height of thirty feet (30'0") at maturity.

G. The future high density frozen storage building proposed for phase three shall be set back a minimum of fifty feet (50'-0") east of Ferger Avenue to the height of: sixty feet (60'-0"), or sixty-six feet with a minor deviation as provided by the Fresno Municipal Code.

H. All noise producing equipment on the building shall meet the standards of the City of Fresno. Truck noise shall not exceed the level of forty-five decibels (45db) inside adjacent residences between the hours of 10:00 p.m. and 6:00 a.m. If noise levels exceed that criteria, mediation measures shall be imposed by the City of Fresno which could include restrictions on hours of operation.

I. All truck maneuvering and parking shall take place on site and shall be subject to the requirements of the City of Fresno.

These nine covenants were prepared at the time that the 1991 Tower District Specific Plan was being proposed as a comprehensive Specific Plan to govern the district in which the project site is located. These nine covenants were then incorporated word-for-word (as shown in Section 2.2 of this Initial Study) into the 1991 Tower District FEIR as mitigation measures specifically addressing the project site at 450 E. Belmont Avenue.

As discussed in Section 6.5 of this Initial Study, the planned demolition of the western third of the north building and half of the planned demolition of the south building was conducted between 1991 and 1992. During demolition of the western half of the South building, an Underground Storage Tank was found and removed in August 1991 (Fresno County Health Department, UST File #FA0169112) **(Figure 18).** After the period of 1991-1992, no further demolition/construction appears to have been undertaken, and the project outlined in the 1991 Tower District Specific Plan FEIR to build new buildings on the property was abandoned for reasons unknown to the preparers of this Initial Study.

Discussion

a. No Impact. The proposed project would not physically divide an establish community.

b. Less than Significant with Project Mitigation.

Fresno General Plan

The proposed project's consistency with the applicable goals and policies of the Fresno General Plan is analyzed below. As shown below **(Table 1)**, the proposed project is consistent with all goals.

Table 1 – General Plan Consistency Analysis - Goals

Goal No.	Goal	Consistency Determination
1	Enhance the quality of life for the citizens of Fresno and plan for the projected population within the moderately expanded Fresno urban boundary in a manner, which will respect physical, environmental, fiscal, economic, and social issues.	**Consistent:** The proposed project consists of infill development of light industrial uses on a site located in an urbanized portion of Fresno. The proposed project would contribute the employment of Fresno residents though construction and transportation jobs. The proposed project would abut E. Belmont Avenue, N. Roosevelt Avenue, and N. Ferger Avenue, and the boundaries of the project would be accessible to vehicles, bicycles, pedestrians, and public transit. As such, the proposed project would enhance the quality of life for Fresno residents in manner that respects physical, environmental, fiscal, economic, and social issues.
2	Pursue coordinated regional planning with Fresno and Madera Counties and the City of Clovis.	**Consistent:** The project site is contemplated for urban development by the General Plan and, therefore, the development of urban uses on the project site would be considered planned growth.
3	Preserve and revitalize neighborhoods, the downtown, and historical resources.	**Consistent:** The proposed project is consistent with the spirit of this goal. The proposed project will help to revitalize the neighborhood through the removal of two boarded up/blighted buildings. See Section 6.5 for a discussion of historical resources.
6	Coordinate land uses and circulation systems to promote a viable and integrated multi-modal transportation network.	**Consistent:** The proposed project would reduce industrial traffic along Fresno City streets, and would contribute to reducing traffic congestion.

7	Manage growth to balance Fresno's urban form while providing an adequate public service delivery system, which is fairly and equitably financed.	**Consistent:** The proposed project is an infill development that promotes the efficient use of local urban resources.
11	Protect, preserve, and enhance significant biological, archaeological, paleontological resources, and critical natural resources, including, but not limited to, air, water, agricultural, soils, minerals, plants, and wildlife resources.	**Consistent:** The proposed project includes mitigation to ensure that air, and water resources are protected. The project will not impact biological, archaeological, paleontological resources.
12	Develop urban design strategies to improve Fresno's visual image and enhance its form and function.	**Consistent:** The proposed project would comply with City design requirements, and documents and drawings will be submitted for review by City staff. Quality building materials would be used throughout development.
13	Plan for a healthy business and diversified employment environment, and provide adequate timely services to ensure Fresno is competitive in the marketplace.	**Consistent:** The project will ensure the continued operations of Producers Dairy which employs many local residents.
14	Protect and improve public health and safety	**Consistent:** The proposed project would provide contribute to public health and safety through the removal of structurally unsound buildings that have been abandoned, deteriorated and damaged.
15	Recognize, respect, and plan for Fresno's cultural, social, and ethnic diversity.	**Consistent:** The proposed project would provide continued employment opportunities that would be accessible to all persons and organizations.
16	Work cooperatively with the local agricultural industry to conserve prime farmland and respect its importance as Fresno County's base economic resource.	**Consistent:** The proposed project is surrounded by urban development on four sides and does not contain any prime farmland. Accordingly, the proposed project would contribute to farmland conservation by continuing Producers Dairy operations which relies on farmland for cattle feed.
17	Encourage fiscal and local agency planning policies that will assist in the annexation of the unincorporated county islands within the City of Fresno's Sphere of Influence.	**Consistent:** The project is within the City of Fresno's Sphere of Influence and will not require annexation.
Source: City of Fresno, 2014.		

The project's consistency with the applicable objectives and policies of the General Plan is provided below. As shown below **(Table 2)**, the proposed project is consistent with all applicable objectives and policies.

Table 2 – General Plan Consistency Analysis – Objectives and Policies

Objective/ Policy No.	Objective/Policy	Consistency Determination
LU-1. Objective	Establish a comprehensive citywide land use planning strategy to meet economic development objectives, achieve efficient and equitable use of resources and infrastructure, and create an attractive living environment.	**Consistent:** The proposed project is an infill project which will create a more efficient use of resources and infrastructure.
LU-1-a. Policy	Promote Development within the Existing City Limits as of December 31, 2012. Promote new development, infill, and rehabilitation of existing building stock in the Downtown Planning Area, along BRT corridors, in established neighborhoods generally south of Herndon Avenue, and on other infill sites and vacant land within the City.	**Consistent**: The proposed project is an infill project south of Herndon Avenue. It will result in the use of two currently vacant lots which total 0.4 acres.
LU-2. Objective	Plan for infill development that includes a range of housing types, building forms, and land uses to meet the needs of both current and future residents.	**Consistent.** The proposed project will provide for the additional trailer parking needs of the local Producers Dairy production site within two blocks of the proposed project.
LU-2-a. Policy	Infill and Redevelopment. Promote development of vacant, underdeveloped, and re-developable land within the City Limits where urban services are available by considering the establishment and implementation of supportive regulations and programs.	**Consistent**. The proposed project is infill development which will result in the use of two currently vacant lots which total 0.4 acres.
LU-4. Objective	Enhance existing residential neighborhoods through regulations, code enforcement, and compatible infill development.	**Consistent**: The proposed project will include a 12-foot sound wall to separate the parking area from neighboring residential areas. There is currently no wall which screens the view nor abates any noise of operations. The 12-foot sound wall will accomplish both.
LU-7. Objective	Plan and support industrial development to promote job growth.	**Consistent**: The proposed project is an industrial project which will support the continued industrial operations of Producers Dairy and ensuring it remains a source of local jobs.
LU-7-c. Policy	Efficiency of Industrial Uses. Promote land use clusters to maximize the operational efficiency of similar activities.	**Consistent**: The proposed project will relocate Producers Dairy's staging over 1.5 miles closer to its production center, reducing local truck traffic by 66% and promoting a more operational efficiency.
D-5. Objective	Maintain and improve community appearance through programs that prevent and abate blighting influences.	**Consistent**: The proposed project will remove two boarded up buildings which have not been utilized for 30+ years.

Source: City of Fresno, 2014.

The project's general consistency with the applicable objectives and policies of the Tower District Specific Plan is provided below. As shown below **(Table 3)**, the proposed project is consistent with all applicable objectives and policies.

Table 3 – Tower District Specific Plan Consistency Analysis – Goals, Objectives and Policies

Goal/ Objective/ Policy No.	Objective/Policy	Consistency Determination
Goal II	Conserve and Enhance Existing Residential Neighborhoods.	**Consistent:** The proposed project is an infill project which will not remove any residential housing.
Objective II.1	Stabilize neighborhoods to prevent any further loss or erosion of character-defining elements.	**Consistent**: The proposed project shall retain the same use (dairy product production/transportation) as has been since the 1930's.
Objective II.2	Revise or eliminate land use or zoning designations which inhibit new economic activity and investment opportunities for the benefit of the Tower District.	**Consistent.** The proposed project will keep the same land use and zoning designations as it currently has, which will allow for continued economic use within the Tower District.
Policy III.2.1	Ensure full access for mobility impaired persons in all parts of the Tower District, and especially in areas which are centers of public and community life.	**Consistent**. The proposed project will replace any sidewalks/ driveways damaged during construction and all new replacements will consistent with current disability access codes & regulations.
Policy III.2.2	Provide security measures to encourage both daytime and nighttime (after dark) activities.	**Consistent**: The proposed project will include security lights and better security fencing which will help to discourage local crime. While primarily aimed at the security of Producers Dairy's facility, this will also increase the security of the area by discouraging local crime.
Policy III.3.1	Retain on-street parking.	**Consistent**: The proposed project will retain existing on-street parking and will not lead to the removal of any existing on-street parking.

Policy III.3.3	Eliminate and prevent on-site surface parking which fronts on major streets, and develop urban, in contrast to suburban, standards for provision of on-site parking.	**Consistent**: The proposed project will continue to provide delivery trailer parking that only fronts onto side streets, and not onto the major street of Belmont Avenue.
Policy III.3.4	Discourage spill-over parking from large institutions into residential neighborhoods.	**Consistent**: The proposed project will continue to only park within its property boundaries. No parking of vehicles will be outside of the property boundaries.
Goal IV	Conserve and Revitalize the Tower District's Historic and Architectural Resources.	**Consistent with Project Mitigation:** The proposed project will remove two partially demolished buildings which are considered historical resources under CEQA. However, the buildings have significantly deteriorated since the adoption of Tower District Specific Plan in 1991. Their structural integrity is highly compromised. The project currently proposes mitigation to offset the impacts to these historical resources. The two buildings See Section 6.5 (Cultural Resources) for more details on these mitigation measures.
Source: City of Fresno, 1991.		

Statement of Covenants Affecting Land Development

The proposed project shall retain the same land use and zoning (Light Industry). The proposed project will not be compatible with the Statement of Covenants A and B listed earlier in this Section and in Appendix E. Given the structurally unsound nature of the buildings as well as the financial infeasibility of refurbishing the buildings as discussed in Section 3.4, implementation of the Statement of Covenants A and B are likely infeasible and the project applicant will need to apply with the City of Fresno to have those Covenants removed. Covenants C, D, E, and G concern the construction of industrial buildings that were never built and are not part of this proposed project. Therefore, Covenants C, D, E, and G would not conflict with the proposed project. Covenants F, H, and I do not conflict with the proposed project and shall be incorporated into the project as the following mitigation measures:

Mitigation Measure LUP 1:
The project proponent shall provide and maintain street trees in tree wells in the sidewalk on the west side of the property south to the entry driveway. These trees and major trees planted along the remainder of the west and south sides of the property shall be a species that attain a minimum height of thirty feet (30'0") at maturity.

Mitigation Measure LUP 2:
Truck noise shall not exceed the level of forty-five decibels (45db) inside adjacent residences between the hours of 10:00 p.m. and 6:00 a.m. If noise levels exceed that criteria, mediation measures shall be imposed by the City of Fresno which could include restrictions on hours of operation.

Mitigation Measure LUP 3:
All truck maneuvering and parking shall take place on site and shall be subject to the requirements of the City of Fresno.

The proposed project will also conflict with the first two mitigation measures of the 1991 Tower District Specific Plan as outlined in Section 2.2 of this Initial Study. As discussed in Section 3.3 and 6.5 of this Initial Study, the buildings on the property are structurally unsound and retaining the north building and the façade of the south building would require extensive retrofitting that will likely be financially unfeasible. As discussed in Section 6.5, a Supplement to an EIR will need to be prepared to address these 1991 Tower District Specific Plan mitigation measures.

c. No Impact. The proposed project is not located within, and will not conflict with, any habitat conservation plans or natural community conservation plans.

6.11 Mineral Resources

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
MINERAL RESOURCES – Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of future 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?	☐	☐	☐	☑

Environmental Evaluation

Environmental Setting

The California Surface Mining and Reclamation Act (SMARA) was enacted to preserve areas for viable mineral extraction activities close to cities, in order to support economic development. SMARA mandates that a "classification/designation" analysis be done to provide information on future mineral resource availability to urban population centers, which depend on these resources for construction and growth. The California Department of Conservation Division of Mines and Geology is required to periodically map high-quality concrete aggregate deposits and to compile periodic statistics on the amount of aggregate minerals available and consumed within designated Production-Consumption (P-C) regions located throughout the state and organized around major metropolitan areas.

Most of eastern Fresno County and south-central Madera County are included in the Fresno P-C Region. Two riparian areas in the Fresno P-C Region have been given special resource Area designation for their concentration of aggregate materials: the upper Kings River and the San Joaquin River.

Discussion

a. No Impact. The project site is not located in an area designated for mineral resource extraction by the Fresno General Plan 2025. In addition, the project site is not located in a mineral resource zone designated by the California Division of Geology and Mines. The proposed project site has already been entirely developed and therefore would not result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State. No impacts will occur.

b. No Impact. The proposed project site is zoned Light Industrial and is located within a densely populated urban area. It would not 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.

6.12 Noise

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
NOISE – Would the project:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☑	☐
b. Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	☐	☐	☑	☐
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☑	☐	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☑	☐
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☑	☐
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☑

Environmental Evaluation

Discussion

a. Less than Significant. The City of Fresno General Plan identifies normally and conditionally acceptable exterior noise levels for specific land use categories that range from 60–70 dB(A) at low-density residential land uses to 75–80 dB(A) at industrial and agricultural land uses.[1]

The principal sources of noise during construction would be the diesel engines of construction equipment and the tools used to remove the building, curbs, paving, and similar features, such as concrete saws, jackhammers, and hoe-rams. Short-term, maximum noise levels from this equipment would be approximately 85 to 90 A-weighted decibels (dB(A)) at a distance of 50 feet. Construction would occur during the hours allowed by the noise ordinance. Therefore, no persons would be exposed to noise levels in excess of the applicable standards. Short-term construction noise levels from jackhammers and concrete saws would create a potentially less than significant impact when the City of Fresno Municipal Code Section 10-109 as outlined below.

Short-term construction noise levels from jackhammers and concrete saws would exceed the noise level standards established in the City's General Plan. However, Section 10-109 of the City of Fresno Municipal Code exempts construction noise when the construction is accomplished pursuant to a City-issued construction permit and is performed between the hours of 7:00 AM and 10:00 PM on any day

[1] City of Fresno, *Draft General Plan MEIR,* (2002) V-K12.

except Sunday. Compliance with City regulations regarding construction hours would ensure that potential construction noise impacts are less than significant.

b. Less than Significant. Heavy construction operations can cause ground borne vibration. The heaviest equipment, such as pile drivers, can generate vibrations of 0.089 to 1.52 inches per second peak particle velocity (PPV) at a distance of 25 feet. It is not anticipated that any of this heaviest equipment would be used on the proposed project. The equipment with the greatest vibration potential that may be used on the proposed project is a jackhammer, with a source level of 0.035 inches per second PPV at 25 feet. There are no applicable City, state, or federal standards for vibration. The Federal Transit Administration (FTA) recommends maximum limits of 0.2 inch per second PPV for fragile buildings and 0.12 inch per second PPV for very fragile buildings. It is not anticipated that jackhammer operations would be closer than 15 feet to buildings, and vibration would not exceed 0.2 inch per second PPV. The impact to buildings would be less than significant. For people passing within 25 feet of the operations, vibration from jackhammer use would be perceptible, but not excessive, and the exposure to vibration would be transient. The impact would be less than significant.

c. Less than Significant with Project Mitigation. The project site is currently used for delivery trailer parking but there is currently no sound wall or barrier blocking the noise of traffic from the residential units neighboring the project site to the south. Additionally, no noise complaints regarding current operations at the project site have been made known to the project proponent. The proposed project will increase the amount of delivery trailer units parked on the project site from the current maximum of 30 trailers to a new maximum of 67 trailers, but will be a Less than Significant Impact with the following mitigation measure:

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.

d. Less than Significant. Ambient noise levels in the project vicinity result from traffic traveling near the project site and adjacent roadways. The project proposes the frequency of truck trips (loaded or empty) to be no greater than (a) one every 10 minutes (six truck trips per hour) during the a.m. and p.m. peak commute hours when ambient traffic noises are at their maximum, and (b) one every five minutes (12 truck trips per hour) during periods other than the a.m. and p.m. peak commute hours when ambient traffic noises are at their maximum. Additionally, the 12-foot-high CMU sound wall on the southern border of the property will help to reduce ambient noise levels.

e. Less than Significant Impact. The proposed project is 1.5 miles from Chandler Airport, which is owned by the City of Fresno and is a public use airport. However, implementation of the project would not change the exposure of people to existing aircraft noise levels.

f. No Impact. The proposed project is not located within the vicinity of a private airstrip. Implementation of the project would not change the exposure of people to existing aircraft noise levels.

6.13 Population and Housing

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
POPULATION AND HOUSING – Would the project:				
a. Induce substantial 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)?	☐	☐	☐	☑
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☑
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☑

Environmental Evaluation

Environmental Setting

The City of Fresno has experienced steady growth over the past 10 years. According to the California State Department of Finance, the incorporated City of Fresno had an estimated population of 494,665 in 2010. The 2010 estimate represents a 15.6 percent increase over the City's population in 2000 (427,652). The General Plan projects the population of the City to reach 790,955 by 2025.

Discussion

a. No Impact. The proposed project would not develop any residential uses and, therefore, would not directly induce population growth through the provision of new dwelling units. Given the very limited scope of the proposed project, the project is estimated to employ 0 new permanent workers less than 15 (if any) temporary workers for the construction/demolition. The California Employment Development Department indicates that as of July 2016, there were 25,000 unemployed persons in the City of Fresno and 43,000 unemployed persons in Fresno County. Given the availability of labor, it would be expected that the new employment opportunities could readily be filled from the local labor force. No impacts would occur.

b. No Impact. The proposed project would occur entirely within existing light industrial property and existing rights-of-way, and would not affect existing housing or displace any residents. No associated impacts would occur.

c. No Impact. The proposed project would occur entirely within existing light industrial property and existing rights-of-way, and would not affect existing housing or displace any residents. No associated impacts would occur.

6.14 Public Services

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

Environmental Evaluation

Environmental Setting

Fire Protection and Emergency Medical Services

The Fresno Fire Department provides fire protection to the City of Fresno and surrounding unincorporated areas. The Fire Department's service area encompasses a 336-square-mile area that includes the North Central Fire Protection District and the Fig Garden Fire Protection District. The Department serves a population of approximately 525,000. The Fire Department is headquartered at 911 H Street in downtown Fresno. The project is located within 4 miles of nine fire stations. The closest fire station is Number 3, located 1.37 miles away at 1406 Fresno Street.

Emergency Medical Services

American Ambulance provides emergency medical services on a contractual basis for the City of Fresno. American Ambulance Paramedics and Emergency Medical Technicians respond to over 80,000 calls originating from 4,000 square miles in Fresno and Kings Counties annually. American Ambulance employs 450 personnel and maintains more than 70 ambulances.

Police Protection

The Fresno Police Department provides police protection within the City of Fresno. The Police Department is organized into seven divisions, including Patrol, Administrative Services, Personnel, Planning and Research, Support, Investigative Services, and Special Operations. The Police Department is headquartered at 2323 Mariposa Mall. The Police Department is divided into four policing districts. The project site is located in the Southwest Policing District. The District office is located 1.5 miles from the project site at Fresno Street and C Street.

Drainage and Flood Control

The project site lies within the jurisdictional boundaries of the Fresno Metropolitan Flood Control District (FMFCD). The FMFCD is responsible for planning, constructing, and maintaining the urban storm drainage collection and disposal facilities necessary to meet the needs of urban development, as well as to control runoff from areas outside the metropolitan area.

The project site is mostly developed and contains both permeable and non-permeable surfaces.

Parks

The City of Fresno maintains over 75 parks. The City of Fresno Parks, After School, Recreation and Community Services Department offer numerous parks including regional parks, neighborhood parks, action sports facilities, play structures, and golf courses.

Schools

The project site is located within the attendance boundaries of Muir Elementary School, Fort Miller Middle School, and Fresno High School in the Fresno Unified School District.

Libraries

The Fresno County Public Library provides collections and services through its Central Resource Library and 34 branches. The Fresno County Library is part of the San Joaquin Valley Library System, a cooperative network of nine public library jurisdictions in the counties of Fresno, Kern, Kings, Madera, Mariposa, and Tulare. The Fresno County Public Library offers a variety of classes, events, and other enrichment opportunities to the citizens of Fresno County. The Central Branch Library, the San Joaquin Valley Heritage & Genealogy Center, and the Talking Book Library for the Blind are within 2 miles of the project site.

Discussion

a.i No Impact. The project consists of changes to an industrial site within the project area, and would not generate new residents and therefore not result in a demand for new or altered fire protection services.

a.ii No Impact. The project consists of changes to an industrial site within the project area, and would not generate new residents and therefore would not result in a demand for any new or altered police protection services.

a.iii No Impact. The proposed project would not generate students; therefore, it would not increase demand for schools in the area.

a.iv No Impact. The proposed project would not increase access to, or demand for, local park and recreation services.

a.v No Impact. The project site is currently served by existing electric facilities. The project would not result in substantial adverse physical impacts associated the provision of new or physically altered facilities. The proposed project would not increase the demand for electricity and gas facilities.

6.15 Recreation

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Recreation – Would the project:				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☑
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☑

Environmental Evaluation

Environmental Setting

The City of Fresno Parks, Recreation, and Community Services Department maintains and operates park and recreational facilities in the city limits. The Parks, Recreation, and Community Services Department operates more than 75 parks, as well as regional trails, campgrounds, and golf courses.

Roeding Regional Park is the most notable park facility in project vicinity. The 90-acre Roeding Park includes a lake, several ponds, and groves of ash, cedar, pine, and eucalyptus, maple, and redwood trees and houses the Fresno Chaffee Zoo as well as picnic areas, tennis courts and horseshoe pits. It also contains two small amusement parks, Playland and Storyland.

Discussion

a. No Impact. The proposed project does not contain any residential uses and would not directly induce population growth. Any potential new employment opportunities created by the proposed project would not induce substantial population growth into the Fresno area from outside areas. Therefore, the proposed project would not result in the need for new or expanded recreational facilities. No impacts would occur.

b. No Impact. The project does not include or require the construction or expansion of recreational facilities. No associated impacts to recreational facilities would occur.

6.16 Transportation and Traffic

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
TRANSPORTATION AND TRAFFIC – Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account 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?	☐	☑	☐	☐
b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☑	☐	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☑
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☑
e. Result in inadequate emergency access?	☐	☐	☑	☐
f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	☑

Environmental Evaluation

Environmental Setting

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 will enter the proposed project from the east side on N. Roosevelt Avenue, and exit on the west side from N. Ferger Avenue. Currently delivery trailers enter and exit from N. Roosevelt Avenue.

Delivery trucks currently travel a 4.2-mile route from the Production Site at 144 E. Belmont Avenue to the current Staging Site at 1752 G Street, and then to Highway 99 and Belmont Avenue **(Figure 25)**. Under the proposed truck project, delivery trucks will travel only 1.4 miles from the Production Site at 144 E. Belmont Avenue to the proposed Staging Site at 450 E. Belmont Avenue, and then to Highway 99 and Belmont Avenue **(Figure 26)**. This results in a 66.66 percent reduction in traffic for the local area **(Table 4)**.

Table 4 – Truck Route Mileage

Routes	Miles
Current	
Production to Staging	2.1
Staging to Freeway	2.1
Total	4.2
Proposed	
Production to Staging	0.4
Staging to Freeway	1
Total	1.4

Figure 25 – Current Transportation Route

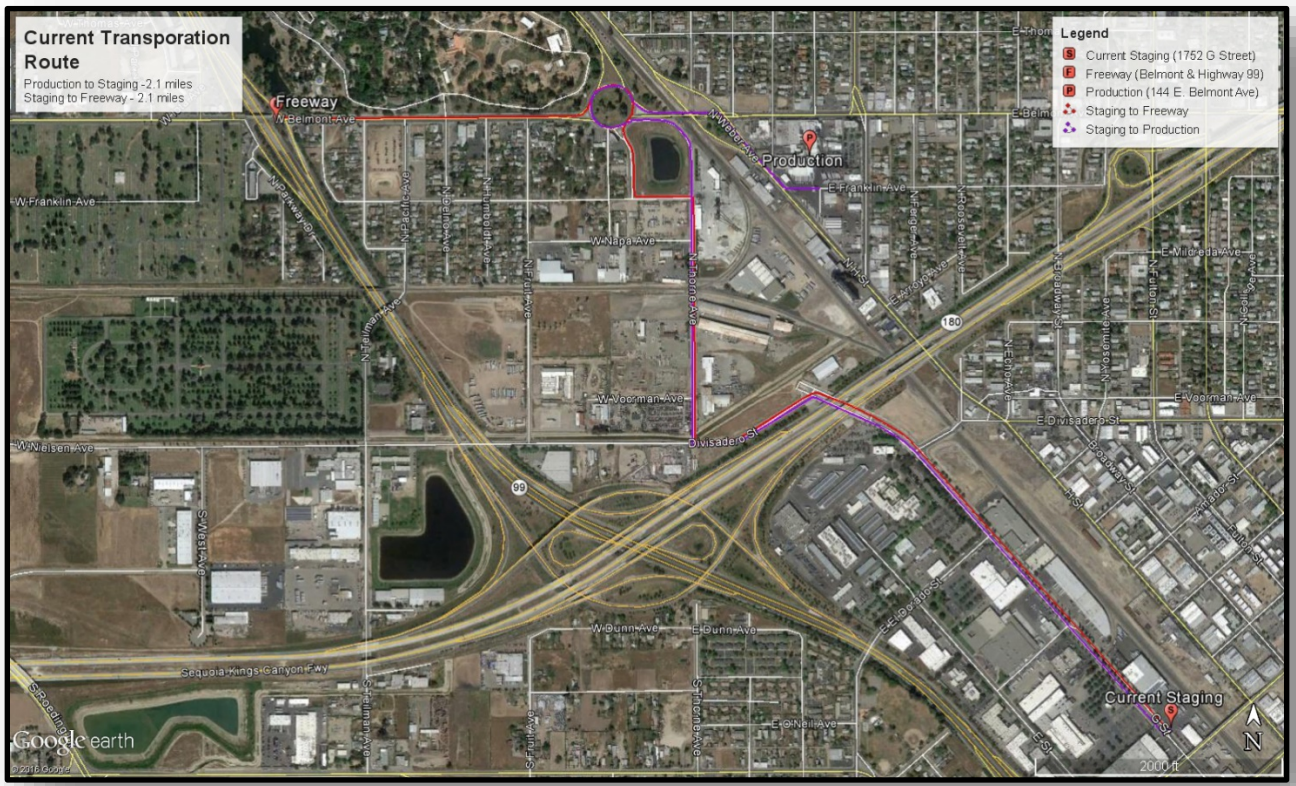
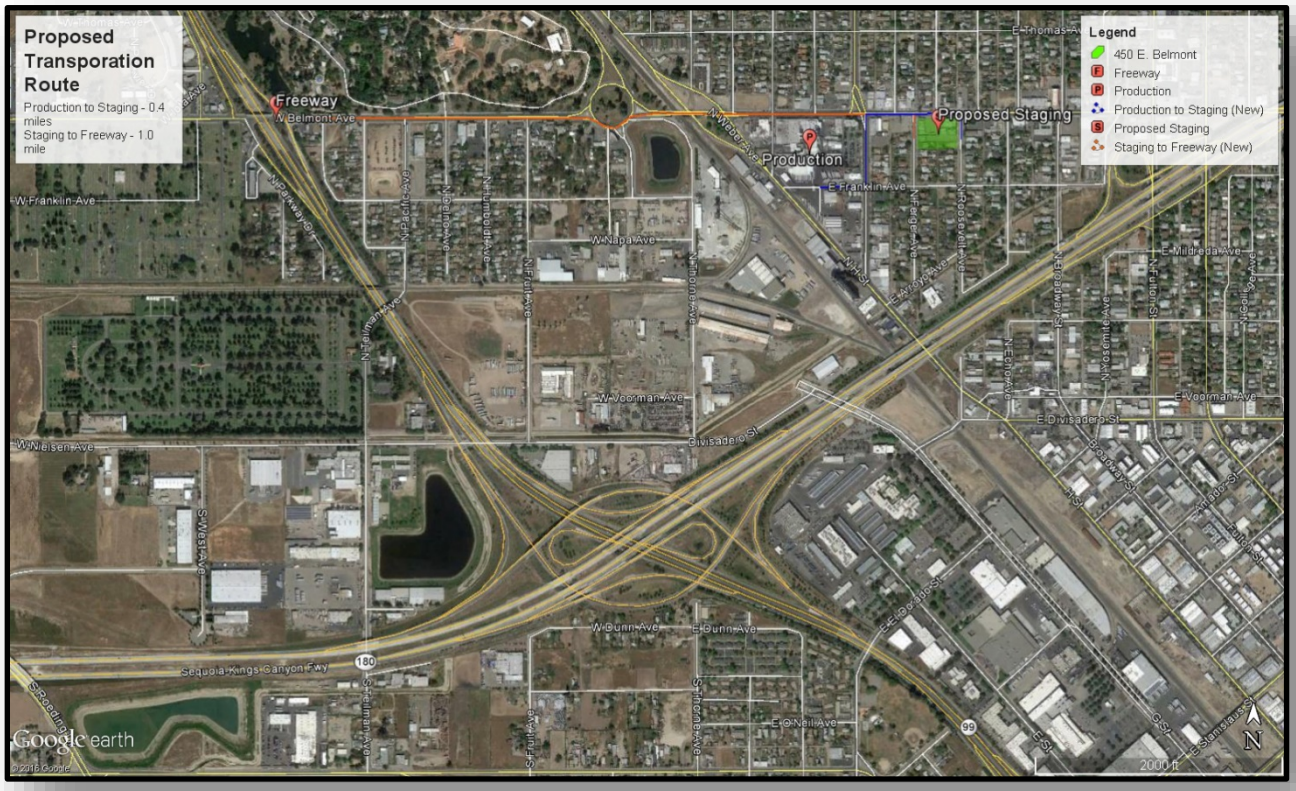


Figure 26 – Proposed Transportation Route



Discussion

a. Less than Significant with Project Mitigation. The proposed traffic will result in indirect (delivery truck) and direct (construction) traffic.

Indirect Traffic and Circulation

As noted in Table 4, Figure 15, and Figure 16 above, indirect effects are reduced under the proposed traffic flow pattern. 2.8 miles of indirect effects are proposed to be reduced with the new traffic flow regime, resulting in a 66.66 percent reduction in traffic in the local area.

Direct - Construction Traffic and Circulation

The proposed project would temporarily and intermittently increase construction traffic volumes on roadways used by demolition-related vehicles. To address potential temporary and intermittent adverse effects to transportation and traffic, the following mitigation measure would be adopted.

Mitigation Measures:

Mitigation Measure TRA 1:

The frequency of truck trips (loaded or empty) shall be no greater than (a) one every 10 minutes (six truck trips per hour) during the a.m. and p.m. peak commute hours, and (b) one every five minutes (12 truck trips per hour) during periods other than the a.m. and p.m. peak commute hours.

Mitigation Measure TRA 2:
The Contractor will restrict project-related vehicle traffic, within the construction area, to established roads, construction areas, and other designated areas.

Mitigation Measure TRA 3:
Observe a 5 mph speed limit for construction areas

Under these limitations, the projected level of indirect and direct traffic would have minimal effects on traffic flow in the local area, and would therefore result in a less than significant impact with project mitigation.

b. Less than Significant with Project Mitigation. See a. above for more details.

c. No Impact. The proposed project will not result in a change in air traffic patterns, and would not including either an increase in traffic levels or a change in location that results in substantial safety risks.

d. Less than Significant. The project does not propose to make changes to roadways that would create road hazards or alter design features developed to mitigate such hazards. The proposed project will be required to implement mitigation measures adopted as part of the Master EIR for the General Plan measures and entitlement conditions of approval will require adherence to City standards for roadway construction, including geometrics (lane curvature and turning radii), number and widths of travel and turn lanes, signalization and signage, bikeways, sidewalks, trails, and bus turnouts.

e. Less than Significant. Because the proposed project will be providing sufficient off-street parking for the proposed project, impacts would be less than significant. The project will not result in inadequate emergency access.

f. Less than Significant. The proposed project will increase only the truck parking spaces within the site and will not impact alternative transportation such as bicycle routes, or bus turnouts.

6.17 Utilities and Services Systems

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
UTILITIES AND SERVICES SYSTEMS – Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☑
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☑
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☑
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?	☐	☐	☐	☑
e. 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?	☐	☐	☐	☑
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☑
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☑

Environmental Evaluation

Wastewater

The City of Fresno Department of Public Utilities, Wastewater Management Division provides wastewater collection and treatment to the City of Fresno.

Collection

The wastewater collection system consists of a network of sewer pipes ranging from 6 to 84 inches in diameter. The collection system totals more than 1,400 miles of sewer lines and includes 15 lift stations.

Fresno/Clovis Regional Water Reclamation Facility

Wastewater is treated at the Fresno/Clovis Regional Water Reclamation Facility (Water Reclamation Facility), located southwest of the City of Fresno near the intersection of Polk Avenue and Jensen Avenue. The Water Reclamation Facility provides wastewater treatment for the urbanized portion of the Fresno/Clovis metropolitan area in accordance with a Joint Powers Agreement between Fresno County, the City of Fresno, and the City of Clovis. Under the Joint Powers Agreement, the City of Fresno was designated as the operator of the plant.

The Water Reclamation Facility has a designated treatment capacity of 80 million gallons per day (mgd) and average dry weather flows of 68mgd. The facility treats effluent generated by both the cities of Fresno and Clovis, and parts of Fresno County. The City of Clovis pays the City of Fresno for its proportionate share of the construction and operation cost of the plant.

Storm Drainage

The project site lies within the jurisdictional boundaries of the FMFCD. The FMFCD is responsible for planning, constructing, and maintaining the urban storm drainage collection and disposal facilities necessary to meet the needs of urban development, as well as to control runoff from areas outside the metropolitan area.

Potable Water

The City of Fresno Department of Public Utilities, Water Division provides potable water service within the city limits and neighboring unincorporated areas. The potable water service area encompasses an area approximately 110 square miles and a population of 502,657. The service area includes the entire area encompassed by its city limits and sphere of influence, including all lands planned to be annexed by the City by 2005, with the exception of the Bakman Water Company, Pinedale County Water District, Herndon Water Company, Park Van Ness Mutual Water Company, California State University Fresno, and various county islands served by private groundwater wells.

Water Supply

The City's water supplies come from three primary sources: groundwater pumped from the Kings Subbasin, and surface water from a contractual allocation of the Fresno Irrigation District's (FID's) Kings River entitlement, and from the federal Friant Division Central Valley Project from the San Joaquin River. Each source is discussed below.

Solid Waste

The City of Fresno Department of Public Utilities, Solid Waste Division provides solid waste, recycling, and green waste collection services to commercial and residential customers within the city limits.

Landfill Capacity

The California Integrated Waste Management Board indicates that the City of Fresno's solid waste is primarily landfilled at the American Avenue Landfill in Tranquility. The American Avenue landfill is permitted to receive 2,200 tons per day and has a remaining capacity of 29.3 million cubic yards. The anticipated closure date is 2031.

Waste Diversion

Fresno was named the number one recycling city in California in 2009 by the California Integrated Waste Management Board (CIWMB), diverting 74 percent of its waste from piling up in landfills. The City has committed to achieving a waste diversion rate of 75 percent by 2012 and a zero-waste goal by 2025.

Discussion

a. No Impact. The project would not lead to an increase in wastewater, and therefore would not exceed wastewater treatment requirements of the applicable RWQCB.

b. No Impact. The project would not lead to an increase in wastewater, and therefore would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities.

c. **No Impact.** The project would not lead to a significant increase in stormwater, and therefore would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities.

d. **No Impact.** The proposed project contains no water pipes on site and would not require any additional water supplies.

e. **No Impact.** The proposed project will not contribute to a substantial increase in wastewater.

f. **No Impact.** The proposed project will follow all local regulations, including those which require the proper disposal of all solid construction waste in the appropriate landfills.

g. **No Impact.** The proposed project will comply with all federal, state, and local statutes and regulations related to solid waste.

7.0 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE				
a. Does the project 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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☑	☐	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are 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. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☑	☐	☐

Environmental Evaluation

Discussion

a. Potentially Significant Impact. As evaluated in this Initial Study, the proposed project would not 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 of animal community; reduce the number or restrict the range of an endangered, rare, or threatened species.

However, the buildings found on the site have been determined to be historic resources. The removal of these buildings, through relocation or demolition, could result in impacts to an example of a major period of California or natural history. A Supplement to an EIR will be prepared for the project that will include an analysis of the project's effects on historical resources.

b. Potentially Significant Impact. The project could result in potential cumulative impacts to cultural resources. This issue will be discussed in the Supplement to an EIR.

c. Less than Significant with Project Mitigation. Prior to the incorporation of mitigation measures, the project could have potential environmental impacts that could cause substantial adverse effects on human beings, either directly or indirectly. The impact topic of cultural resources will be analyzed further and mitigation measures proposed in the Supplement to an EIR. The following environmental issue areas will require mitigation to reduce impacts to a less-than-significant level: **Land Use and Planning (Section 6.10), Noise (Section 6.12), and Transportation and Traffic (Section 6.16).**

8.0 Mitigation Measures

The following mitigation measures are identified for the proposed project:

Table 5 – Mitigation Measures Summary

CEQA Checklist Section	MM #	Mitigation Measure
Aesthetics		No Mitigation Measures for this Section
Agricultural Resources		No Mitigation Measures for this Section
Air Quality		No Mitigation Measures for this Section
Biological Resources		No Mitigation Measures for this Section
Cultural Resources	CUL 1	The proposed project will include an installation of a commemorative monument with a plaque explaining the history of the buildings on the property, the character-defining features of Mission Revival style and the importance of the style within the City of Fresno. The monument will be located on the east side of the site, near the N. Roosevelt Avenue entrance. The monument will have a 2.5 foot base foundation with an 8 foot long by 5 foot high wall. Brick from the existing buildings shall be incorporated into the construction of the commemorative monument. Efforts should be taken in designing the commemorative monument to incorporate the curved parapet of the Mission Revival style currently present in the North building.
	CUL 2	The proposed project will include an installation of a sound wall. The wall will be along the southwest, southern, and southeast borders of the property. If feasible, brick from the existing buildings shall be incorporated into the wall. This work will require demolition of an existing concrete masonry wall on the southern boundary.
	CUL 3	Retain a photographer qualified in large format architectural photography to perform a photo documentation of the north building. This will provide a proper public record of the site's architectural significance. Any photo documentation would then be recorded with a local library.
	CUL 4	Any potential future buildings constructed on-site shall be designed with a curved parapet and cantilevered Spanish tile overhang to mimic the current architectural style of the current buildings.

	CUL 5	Salvage building materials to be reused for educational purposes or to be incorporated into other buildings through donation of materials to interested local government entities.
	CUL 6	Install a decorative iron fence with brick pilasters of appropriate spacing along the northwest, north, and northeast boundaries of the project site. If feasible, brick from the existing buildings will be incorporated into the pilasters.
Greenhouse Gases		No Mitigation Measures for this Section
Geology and Soils		No Mitigation Measures for this Section
Hazards and Hazardous Materials		No Mitigation Measures for this Section
Hydrology and Water Quality		No Mitigation Measures for this Section
Land Use and Planning	LUP 1	The project proponent shall provide and maintain street trees in tree wells in the sidewalk on the west side of the property south to the entry driveway. These trees and major trees planted along the remainder of the west and south sides of the property shall be a species that attain a minimum height of thirty feet (30'0") at maturity.
	LUP 2	Truck noise shall not exceed the level of forty-five decibels (45db) inside adjacent residences between the hours of 10:00 p.m. and 6:00 a.m. If noise levels exceed that criteria, mediation measures shall be imposed by the City of Fresno which could include restrictions on hours of operation.
	LUP 3	All truck maneuvering and parking shall take place on site and shall be subject to the requirements of the City of Fresno.
Mineral Resources		No Mitigation Measures for this Section
Noise	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.
Population and Housing		No Mitigation Measures for this Section
Public Services		No Mitigation Measures for this Section
Recreation		No Mitigation Measures for this Section
Transportation and Traffic	TRA 1	The frequency of truck trips (loaded or empty) shall be no greater than (a) one every 10 minutes (six truck trips per hour) during the a.m. and p.m. peak commute hours, and (b) one every five minutes (12 truck trips per hour) during periods other than the a.m. and p.m. peak commute hours.
	TRA 2	The Contractor will restrict project-related vehicle traffic, within the construction area, to established roads, construction areas, and other designated areas.
	TRA 3	Observe a 5 mph speed limit for construction areas.

Utilities and Service Systems		No Mitigation Measures for this Section

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10.0 Report Preparers

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Appendix A: Schematic Condition Assessment

Appendix B: Phase I Environmental Site Assessment

Appendix C: Asbestos Survey, Lead-Based Paint & PCB Inspection Report

Appendix D: RWQCB Correspondence

Appendix E: Statement of Covenants Affect Land Development

Appendix F: Report to the Historic Preservation Commission