Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
	[redacted]
	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

Objection Signature Sheet

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Signature	Address
Brooke I Hamilton	[redacted]
Brooke A Hamilton	" "

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Signature	Address
Debra L. Buller	[redacted]
Larry Buller	[redacted]

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Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

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This would affect three parcels in our neighborhood that are currently zoned for office and potentially a number of existing offices. We already have one parcel zoned for high density multi family. This parcel at Prospect and Herndon was rezoned as part of the 2030 rezone during the Holiday Season in 2015 with no input from nearby residents.
Steve Brandau did not protect his constituents with provisions to revisit parking and density like were done in District 6.

We object to the ministerial zoning that "meets the City's development code." There is no planning involved with this code. The Planning Department does not consider any existing or future problems that might be exacerbated by the development. The planners and city council do not consider the preservation and character of the neighborhood.

The City has created the problems that make multi family development in this neighborhood impractical. We have made the City aware of these problems on NUMEROUS occasions starting with emails to Councilman Karbassi in 2019. We have attended numerous meetings. We delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These signatures were attached to a document that noted:
1) Inadequate parking for Orchid Park. The parking was inadequate for what they planned the park to be from day 1. It should be noted that original property owners paid park fees and had to wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks have become regional parks." It should be noted that the Pickleball courts at Orchid Park are one of the most popular in the city. The parking lot often barely accommodates this.
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3) The small short street (Prospect) with the POORLY DESIGNED ROUNDABOUT and unworkable traffic flow on one of the two access roads into the neighborhood. The city has long promised to run Fir through to Valentine Avenue when they build the park. It was promised again when Leo Wilson built a large housing development adjacent to the park. Just this year it was considered but then cancelled by Councilman Karbassi at the budget hearing. Jerry Dyer now says those promises from the city are "too old."
4) Altered traffic patterns throughout the neighborhood as a result of people avoiding Prospect

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5) School safety. There should be a direct path from both the existing new developments and the proposed new ones for children to walk to their elementary school. The City Manager, Georgeanne White says that, "they are not required to provide one." The neighborhood is already choked with traffic at peak pick up and drop off times. It is not safe for children to navigate alone which generates even more traffic.

6) Public Safety Vehicles. Ambulance and Fire Department vehicles have trouble navigating the roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood NOW.

7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning engines, and just the heavier traffic can be heard blocks away.

8) Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on proposed plans for new developments. This will exacerbate the congestion on these streets at peak times and cause traffic to back up onto Herndon Avenue.

We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause.

If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the response was "was this something you received in the mail?" We never received any answer as to what this was going to do.

The City has refused to keep their promises. They refuse to fix the problems brought forth to them. They definitely are not transparent in their actions.

High density multi family housing has already been rejected by the Project Review Committee, the Planning Commission, and by the City Council. This amendment would basically overturn those decisions and ruin a neighborhood that already has all types of housing. This amendment would negate the will of the people who have already prevailed on this issue despite a secretive, abusive, and uneven playing ground.

As this amendment will further erode the public's right to participate in addressing development in their own communities it should be denied.

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Signature	Address
DEELLA A. RAY	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

By DECEMBER 20, 2024

Subject: Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

To: Adrienne.Asadoorian@fresno.gov

I am writing to formally object to the Notice of Intent to Adopt a Mitigated Negative Declaration related to Parcel Number P24-00794, which is part of a citywide text code amendment. While this amendment affects multiple areas, its implications for our neighborhood are particularly concerning.

This amendment targets three parcels currently zoned for office use and potentially others, in addition to the one parcel already rezoned for high-density multifamily housing at Prospect and Herndon. That rezoning occurred during the 2015 holiday season with little to no input from affected residents. Unlike other districts, such as District 6, this area lacks adequate protections for parking and density concerns, leaving the community vulnerable to overdevelopment.

Specific Concerns:

1. **Lack of Planning and Neighborhood Consideration**:
   - Ministerial zoning that "meets the City's development code" disregards the unique needs and existing challenges in our neighborhood.
   - There has been no effort to consider how this amendment exacerbates ongoing issues such as traffic congestion, safety, and quality of life.
2. **Broken Promises and Community Frustration**:
   - Despite numerous emails, meetings, and petitions—most notably 929 signatures submitted in September 2021 and May 2024—the City has not addressed longstanding issues, including inadequate parking at Orchid Park, poor road infrastructure, and insufficient traffic mitigation measures.
3. **Traffic and Safety Concerns**:
   - The poorly designed roundabout on Prospect Street, coupled with inadequate access roads, already causes significant congestion. Increased density will only worsen these conditions.
   - There is no safe path for children walking to the local elementary school, further endangering students during peak traffic times.
   - Emergency vehicles such as ambulances and fire trucks struggle to navigate the neighborhood's current infrastructure.
4. **Environmental and Quality-of-Life Impacts**:
   - Increased noise and air pollution due to heavy traffic on Herndon Avenue directly affect residents' well-being.
   - The City's allowance for ingress and egress onto main feeder streets will further congest these roads and create backups onto Herndon.
5. **Lack of Transparency and Public Engagement**:
   - The City has failed to provide clear and timely communication about this amendment, raising concerns about its commitment to transparency.
   - High-density housing proposals have previously been rejected by the Project Review Committee, Planning Commission, and City Council. This amendment would overturn those decisions, disregarding the will of the community.

Conclusion:

This amendment undermines the public's right to participate in decisions about their neighborhoods and disregards the valid concerns of residents who have fought for responsible development. The proposed changes would impose permanent, detrimental impacts on our community; further eroding trust in the City's planning process.
I respectfully urge the City to reject this amendment. It is imperative that community voices are considered, and that thoughtful, transparent planning takes precedence over rushed policies.
Thank you for your attention to this matter.

Sincerely,

Name: Jimmy Lee Heskett Address: [redacted]

[redacted]

December 14, 2024

RE: Notice of Intent to Adopt a Mitigated Negative Declaration regarding Parcel P24-00794

Dear Ms. Asadoorian:

I am writing to object to the Notice of Intent to Adopt a Mitigated Negative Declaration regarding Parcel P24-00794 and the reconsideration of Building App. No. P21-00989 that previously failed to gain approval by Project Review Committee, the Fresno Planning Commission, and the City Council for numerous problematic issues.. The 82 unit 3 and 4 story apartment complex at Herndon Avenue and N. Prospect Avenue as proposed should not be built as currently planned for a number of significant reasons that present several potential risks and liability for future residents of the facility.

These include:
1. Building evacuation in case of fire,
2. Access to the proposed project off Prospect by the fire department,
3. Safe pedestrian pathways from the proposed project to the H. Roger Tatarian elementary school,
4. Increased traffic thru the poorly configured and too small traffic circle on Prospect, north of Herndon, and
5. Inadequate parking spaces for the proposed complex.

The developer's representative at the Planning Commission meeting stated that the target clientele of the proposed project would be senior citizens. Many elderly individuals have limited mobility and some seniors are easily confused when placed in stressful situations, particularly if they have mild dementia. During a building evacuation because of fire when elevator use is prohibited, many senior citizens may be unable to quickly negotiate third and fourth floor stairways to move to safety outside the buildings. In addition
, the four-story portion will not have windows on the eastern side of the building thereby limiting rescue access by firefighters using ladder trucks.

N. Prospect Avenue itself is too narrow at the level of the tiny turn-around circle to accommodate a pickup truck towing a moderate-sized trailer. I question the ability of a fire ladder truck to negotiate a turn into the proposed complex especially if and when facility residents are attempting to move their vehicles to safety. These difficulties would certainly delay both fire fighter evacuations of facility residents and delay implementation of fire fighting efforts.

Despite the developer's belief that the proposed complex would be largely inhabited by senior citizens, one must assume that given its proximity to an elementary school, any number of families with children would also be residents of the complex. Safe pedestrian pathways do not exist currently between the proposed complex and H. Roger Tatarian elementary school; rather children would need to either walk along the gravel shoulder of the narrow two lane portion of N. Valentine Avenue that parallels Herndon Avenue or traverse the open field north of that side road. Placing those young children at risk from drivers hurrying to work along the already congested road seems unwise when increased traffic along N. Prospect from the proposed complex must be assumed.

The poorly designed connection of N. Valentine Avenue to Herndon Avenue, where N. Valentine becomes a frontage road that enters Prospect Avenue from the West, has already created a significant obstacle to the smooth flow of traffic from N. Valentine onto Herndon Avenue. Complicating the flow of traffic further at N. Prospect and Herndon by adding additional traffic from an 82 unit apartment complex will lead to undue congestion and innumerable fender-bender accidents along N. Prospect.

One must expect that most of the target clientele (senior citizens) of the proposed project will be moving into the apartments to "down-size" their remaining years and will have two vehicles or the residents will be working parents with two vehicles. The proposed apartment complex does not have adequate parking facilities to accommodate even 150 vehicles, much less 164 cars and trucks. Local street parking lacks the capacity to support more than a few extra vehicles.

May I suggest that several changes be made to either or both the proposed complex or the surrounding street traffic infrastructure. Certainly, anticipating the numerous problems noted above and providing solutions prospectively would seem wise. I remember that the traffic signal at Marks and Herndon Avenue was constructed to replace the 4-way stop signs only after a Supervisor's teenage daughter was killed in a traffic accident at that intersection. Prospectively dealing with the above mentioned problems might save lives in the future.

I humbly suggest several potential solutions:

1. Down-size the proposed project to a maximum of two-story buildings
2. Move the entrance and exit from the proposed complex to W. Fir Avenue instead of N. Prospect Avenue.
3. Widen the frontage road portion of N. Valentine Avenue that parallels Herndon Avenue and add a sidewalk along the northern portion of that road and along N. Prospect Avenue while widening N. Prospect Avenue itself along with the construction of a larger traffic turning circle to N. Prospect Avenue.
4. Maintain or increase the number of parking spaces in the proposed complex despite down-sizing the number of proposed housing units themselves.

These corrective suggestions surely might be implemented by either the city or the developer of Parcel Number P24-00794 if the City of Fresno were concerned for any future residents of any development project on the aforementioned parcel of land.

In conclusion, I strenuously object to the Notice of Intent to Adopt a Mitigated Negative Declaration as a city wide code amendment and more specifically for application of any such declaration in regard to Parcel Number P24-00794 for the reasons stated above because development of the parcel per Building App. No. P21-00989 without significant corrective measures would place future resident adults and their children at significant risk of injury.

Yours Sincerely,

Virgil M. Airola

From: [redacted]
To: Adrienne Asadoorian
Subject: Object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794
Date: Thursday, December 19, 2024 6:27:33 AM

External Email: Use caution with links and attachments

We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment.
This would affect three parcels in our neighborhood that are currently zoned for office and potentially a number of existing offices. We already have one parcel zoned for high density multi family. This parcel at Prospect and Herndon was rezoned as part of the 2030 rezone.
We object to the ministerial zoning that "meets the City's development code." There is no planning involved with this code. The Planning Department does not consider any existing or future problems that might be exacerbated by the development. The planners and city council do not consider the preservation and character of the neighborhood.
The City has created the problems that make multi family development in this neighborhood impractical. We have made the City aware of these problems on NUMEROUS occasions starting with emails to Councilman Karbassi in 2019. We have attended numerous meetings. We delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These signatures were attached to a document that noted:
1) Inadequate parking for Orchid Park. The parking was inadequate for what they planned the park to be from day 1. It should be noted that original property owners paid park fees and had to wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks have become regional parks." It should be noted that the Pickleball courts at Orchid Park are one of the most popular in the city. The parking lot often barely accommodates this.
2) No street parking for the vehicles that will be generated by new developments. The parking requirements listed by a state code used by the Planning Department are totally inadequate for multi family housing:
3) The small short street (Prospect) with the POORLY DESIGNED ROUNDABOUT and unworkable traffic flow on one of the two access roads into the neighborhood.
4) Altered traffic patterns throughout the neighborhood as a result of people avoiding Prospect and using Brawley Avenue instead. Again the city is adding higher density on each parcel leading to roads through the neighborhood that were not designed to handle that traffic. With each new development the quality of life in the existing neighborhood has deteriorated.
5) School safety. There should be a direct path from both the existing new developments and the proposed new ones for children to walk to their elementary school.It is not safe for children to navigate alone which generates even more traffic.
6) Public Safety Vehicles. Ambulance and Fire Department vehicles have trouble navigating the roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood.
7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning engines, and just the heavier traffic can be heard blocks away.
8) Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on proposed plans for new developments. This will exacerbate the congestion on these streets at peak times and cause traffic to back up onto Herndon Avenue.
We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed in the subject line We object to the text
code amendment that would allow ministerial zoning for multi-family in our neighborhood. Please consider these our official signatures for objection.
Kellie Romero
Paul Romero

[redacted]

Sent from my iPhone

Dwight G. Nelson

[redacted]

December 11, 2024

Mrs. Adrienne Assadoorian, Planner
City of Fresno
2600 Fresno Street
Fresno, CA 93721

RE: Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

SENT VIA EMAIL - Adrienne.Asadoorian@fresno.gov

Dear Mrs. Assadoorian,

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This amendment targets three parcels currently zoned for office use and potentially others, in addition to the one parcel already rezoned for high-density multifamily housing at Prospect and Herndon. That rezoning occurred during the 2015 holiday season with little to no input from affected residents. Unlike other districts, such as District 6, this area lacks adequate protections for parking and density concerns, leaving the community vulnerable to overdevelopment.

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Conclusion:
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I respectfully urge the City to reject this amendment. It is imperative that community voices are considered, and that thoughtful, transparent planning takes precedence over rushed policies.

Thank you for your attention to this matter.

Respectfully,

Dwight Nelson

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Signature	
	[redacted]
	[redacted]
	[redacted]
	[redacted]
Virgie Farris	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

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Signature	Address
	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]

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Signature	Address
Nancy Koretzky	[redacted]
	[redacted]

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By DECEMBER 20, 2024

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Signature	Address
Annie Barrios-Copner	[redacted]

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By DECEMBER 20, 2024

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Signature	Address
	[redacted]
Janean Wolfe	[redacted]

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Signature	Address
Amber Nelson	[redacted]

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6) Public Safety Vehicles. Ambulance and Fire Department vehicles have trouble navigating the roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood NOW.

7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning engines, and just the heavier traffic can be heard blocks away.

8) Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on proposed plans for new developments. This will exacerbate the congestion on these streets at peak times and cause traffic to back up onto Herndon Avenue.

We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause.

If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the response was "was this something you received in the mail?" We never received any answer as to what this was going to do.

The City has refused to keep their promises. They refuse to fix the problems brought forth to them. They definitely are not transparent in their actions.

High density multi family housing has already been rejected by the Project Review Committee, the Planning Commission, and by the City Council. This amendment would basically overturn those decisions and ruin a neighborhood that already has all types of housing. This amendment would negate the will of the people who have already prevailed on this issue despite a secretive, abusive, and uneven playing ground.

As this amendment will further erode the public's right to participate in addressing development in their own communities it should be denied.

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
Deborah Morton Tuttle	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

Objection Signature Sheet

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Signature	Address
	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

From: [redacted]
To: Adrienne Asadoorian
Subject: Objection letter.
Date: Friday, December 20, 2024 2:35:27 PM

External Email: Use caution with links and attachments

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
Lydia Torres	[redacted]
Gustavo Torres	[redacted]

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
[illegible]	[redacted]
[illegible]	[redacted]
Eyvonne Malm	[redacted]
William Day	[redacted]

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
	[redacted]
	[redacted]

Objection Signature Sheet

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Signature	Address
	[redacted]
Vlubbie DeSoto	[redacted]
	[redacted]
Diane C Stevens	[redacted]
	[redacted]
Ann M Mach	[redacted]

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

So. Side Ave

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
JESSIE ROJAS	[redacted]
KAMRAN ASSEMI	[redacted]
Brittany Assemi	[redacted]
Gail Futrell Wehner	[redacted]
Hannah Wehner	[redacted]
Debbie Ward	[redacted]

Sent from my iPhone

W Spruce Ave Southside

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
Maureen Callaway	[redacted]
Harry Roth	" " "
Constance Curran	[redacted]
Christopher Curran	[redacted]
Ryan Curran	[redacted]
Vinson Lion	[redacted]
Heilung Lion	[redacted]
Joanne Thompson	[redacted]
[illegible]	[redacted]
[illegible]	[redacted]
Mansour Hajigadgan	[redacted]
Mansoureh Poustchi	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

From: [redacted]
To: Adrienne Asadoorian
Subject: Objection letter
Date: Thursday, December 19, 2024 3:28:57 PM

External Email: Use caution with links and attachments

I object to the NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION with application number P24-00794 for a citywide text code amendment.

We have been fighting multi family development in our neighborhood for the past four years. A parcel was rezoned for multi family in 2015 during a citywide rezone. This was also done during the Christmas holiday season and approved by the city council in early 2015.

The public was only notified of this amendment in a small ad in the classified section of the Fresno Bee. This may comply with the Municipal Code, but as was pointed out at the City Council meeting last July, most of us do not subscribe to the Bee and fewer read the public notices. The City uses many forms of communication when they want the public to know about something. The Municipal Code should be updated. My husband found this in the Planning Department notices only because he checked on the listed notice. If we had not specifically requested to receive the notices by going down to city hall we never would have known about this.

I further object to the fact that our elected city representatives were aware of this text amendment when we were at the City Council hearing on July 25th of this year. This amendment would totally undermine all of our neighborhood objections on the parcel in question.

We are citizens who have to try to keep track of these things ourselves. We do not have community activists from non profit organizations or non profit legal firms representing us.

I doubt it is just luck that these proposals and meetings almost always coincide with the holidays when they think the public will be busy.

This text amendment went out to the various Project Review Committees in August and September which was shortly after the City Council voted in July. It certainly appears that our elected officials and city management do not want us to find out about these things until it is too late.

We have repeatedly outlined the issues with traffic, parking, inadequate and unworkable roads, and public safety access into the existing neighborhood at peak times. This amendment would eliminate any opposition to zoning changes without consideration of the impact on the neighborhood.

We also highly object to having the representation process eliminated. We worked very hard for our homes. We want our government to be transparent and have our voices heard.

Many recent state policies have been responsible for billions of wasted taxpayer dollars. Many more have not worked. We do not want our neighborhood to be the victim of an unproven state policy that will be PERMANENT once it is adopted. When the obvious problems arise the city officials will throw up their hands and claim unforeseen circumstances.

I would ask you to not approve this text amendment which eliminates the voice of the people in the development process which is already secretive enough.

If this amendment is adopted I would ask that the undeveloped parcels between Marks and Milburn on Herndon Ave be removed or excluded from this amendment.

Thank you for your consideration.
Debbie Nard
Sent from my iPad

OBJECTIONS

We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment.

This would affect three parcels in our neighborhood that are currently zoned for office and potentially a number of existing offices. We already have one parcel zoned for high density multi family. This parcel at Prospect and Herndon was rezoned as part of the 2030 rezone during the Holiday Season in 2015 with no input from nearby residents.
Steve Brandau did not protect his constituents with provisions to revisit parking and density like were done in District 6.

We object to the ministerial zoning that "meets the City's development code." There is no planning involved with this code. The Planning Department does not consider any existing or future problems that might be exacerbated by the development. The planners and city council do not consider the preservation and character of the neighborhood.

The City has created the problems that make multi family development in this neighborhood impractical. We have made the City aware of these problems on NUMEROUS occasions starting with emails to Councilman Karbassi in 2019. We have attended numerous meetings. We delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These signatures were attached to a document that noted:
1) Inadequate parking for Orchid Park. The parking was inadequate for what they planned the park to be from day 1. It should be noted that original property owners paid park fees and had to wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks have become regional parks." It should be noted that the Pickleball courts at Orchid Park are one of the most popular in the city. The parking lot often barely accommodates this.
2) No street parking for the vehicles that will be generated by new developments. The parking requirements listed by a state code used by the Planning Department are totally inadequate for multi family housing.
3) The small short street (Prospect) with the POORLY DESIGNED ROUNDABOUT and unworkable traffic flow on one of the two access roads into the neighborhood. The city has long promised to run Fir through to Valentine Avenue when they build the park. It was promised again when Leo Wilson built a large housing development adjacent to the park. Just this year it was considered but then cancelled by Councilman Karbassi at the budget hearing. Jerry Dyer now says those promises from the city are "too old."
4) Altered traffic patterns throughout the neighborhood as a result of people avoiding Prospect

and using Brawley Avenue instead. Again the city is adding higher density on each parcel leading to roads through the neighborhood that were not designed to handle that traffic. With each new development the quality of life in the existing neighborhood has deteriorated.

5) School safety. There should be a direct path from both the existing new developments and the proposed new ones for children to walk to their elementary school. The City Manager, Georgeanne White says that, "they are not required to provide one." The neighborhood is already choked with traffic at peak pick up and drop off times. It is not safe for children to navigate alone which generates even more traffic.

6) Public Safety Vehicles. Ambulance and Fire Department vehicles have trouble navigating the roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood NOW.

7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning engines, and just the heavier traffic can be heard blocks away.

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We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause.

If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the response was "was this something you received in the mail?" We never received any answer as to what this was going to do.

The City has refused to keep their promises. They refuse to fix the problems brought forth to them. They definitely are not transparent in their actions.

High density multi family housing has already been rejected by the Project Review Committee, the Planning Commission, and by the City Council. This amendment would basically overturn those decisions and ruin a neighborhood that already has all types of housing. This amendment would negate the will of the people who have already prevailed on this issue despite a secretive, abusive, and uneven playing ground.

As this amendment will further erode the public's right to participate in addressing development in their own communities it should be denied.

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
Lark and Mike Hilliard	[redacted]
Lark Hilliard & Mike Hilliard	

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

OBJECTIONS

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Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

Objection Signature Sheet

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Signature	Address
[illegible]	[redacted]
Cheryl Cerniglia	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

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Signature	Address
[illegible]	[redacted]
Marcella L. DeLuca	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

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Signature	Address
[illegible]	[redacted]
Tracy Hansen	[redacted]
[illegible]	[redacted]
Chris Hansen	[redacted]
Cole Hansen Hall	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

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Signature	Address
Linda Fulkerson	[redacted]
Larry Fulkerson	[redacted]
[illegible]	[redacted]
Rick Behnke	[redacted]
Julie Wells	[redacted]
Chuck Wells	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

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Signature	Address
[illegible]	[redacted]
Jeannie S. Cole	[redacted]
[illegible]	[redacted]
Bernice Darnell	[redacted]
Marilyn Griffin	[redacted]
Diane Montgy	[redacted]
Tamera Cow[illegible]	[redacted]
[illegible]	[redacted]
[illegible]	[redacted]
[illegible]	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
Marvel Caiati	[redacted]
[illegible]	[redacted]
Diane Hurst	[redacted]
Debbie Vinters	[redacted]
[illegible]	[redacted]
Daniel Gatin	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

From: [redacted]
To: Adrienne Asadoorian
Subject: Objection to Notice of Intent to Adopt a Mitigated Negative Declaration P-2400794
Date: Thursday, December 19, 2024 9:48:32 PM

External Email: Use caution with links and attachments

I am objecting to this proposal as it will remove the opportunity to voice our legitimate concerns regarding infrastructure, traffic, parking and public safety on the parcels deemed eligible by the proposal.
The community where my husband and I have lived for several years has recently navigated the process of having a property rezoned without our community's knowledge. When the proposed development for the rezoned property was made public, the neighbors voiced their concerns regarding infrastructure, traffic and public safety in front of the Fresno Planning Commission and The Fresno City Council. Both voted against the proposed development. During this process, the city management refused to come out to look at the traffic congestion after being asked to do so by the neighbors.
The public's input is necessary to ensure responsible development and those neighbors living in the potentially impacted communities have their voices heard!!!!
I would ask that this proposal be denied in total, or at least remove the properties on Herndon between Marks and Millburn from the list of properties eligible for this action.
Respectfully submitted,
Paula Moradian

From: [redacted]
To: Adrienne Asadoorian
Cc: [redacted]
Subject: Objection to Notice of Intent to Adopt a Mitigated Negative Declaration P-2400794
Date: Wednesday, December 18, 2024 8:51:10 PM

External Email: Use caution with links and attachments

I am objecting to this proposal as it is yet another measure that will reduce local control over building in the various parts of the city. This proposal would effectively eliminate the input from neighboring properties on the parcels deemed eligible by this proposal.

Just in my neighborhood there are parcels that have been requested for rezone to build housing. The neighbors have raised their objections due to lack of infrastructures in the area. There is currently litigation over one development. This proposal would effectively overturn the decision from the Project Review Committee, the Planning Commission, and the City Council.

The Planning Department never considers the impact on the surrounding properties in making their determinations. By allowing housing development on property zoned office invites a multitude of problems with traffic, parking, and public safety.

I would ask that this proposal be denied in total, or at least remove the properties on Herndon between Marks and Milburn from the list of properties eligible for this action.
Thank you for your consideration.
Dennis Nard.
Sent from my iPad

OBJECTIONS

We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment.

This would affect three parcels in our neighborhood that are currently zoned for office and potentially a number of existing offices. We already have one parcel zoned for high density multi family. This parcel at Prospect and Herndon was rezoned as part of the 2030 rezone during the Holiday Season in 2015 with no input from nearby residents.
Steve Brandau did not protect his constituents with provisions to revisit parking and density like were done in District 6.

We object to the ministerial zoning that "meets the City's development code." There is no planning involved with this code. The Planning Department does not consider any existing or future problems that might be exacerbated by the development. The planners and city council do not consider the preservation and character of the neighborhood.

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7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning engines, and just the heavier traffic can be heard blocks away.

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We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause.

If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the response was "was this something you received in the mail?" We never received any answer as to what this was going to do.

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As this amendment will further erode the public's right to participate in addressing development in their own communities it should be denied.

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
Peggy Pedersen	[redacted]
Paul Peder	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

From: [redacted]
To: Adrienne Asadoorian
Subject: Objection to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794
Date: Friday, December 20, 2024 2:30:47 PM

External Email: Use caution with links and attachments

Dear Adrienne

My wife and I are objecting to the Notice of Intent to Adopt a Mitigated Negative Declaration listed
with Parcel Number P 2 4 - 0 0 7 9 4 even though it is a city wide text code amendment.

This text code amendment would affect *three* parcels in our neighborhood that are currently zoned for office space.

We already have one parcel zoned for high density, multi family. This parcel at Prospect and Herndon was rezoned as part of the 20-30 rezone
during the Holiday Season in 2015 with no input from nearby residents.

We object to the ministerial zoning that "meets the City's development code."

- **There is no planning involved with this code.**
- **The Planning Department does not consider any existing or future problems that might be exacerbated by the development.**
- **The planners and city council do not consider the preservation and character of the neighborhood.**

The City has created the problems that make multifamily development in our neighborhood
impractical.

The following issues were pointed out to the Planning Department regarding proposed high density housing on Parcel Number P24 –

00794:

1) Inadequate parking for Orchid Park. The parking was inadequate for what they planned the
park to be from day 1. It should be noted that original property owners paid park fees and had to
wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged
this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks
have become regional parks." It should be noted that the Pickleball courts at Orchid Park are
one of the most popular in the city. The parking lot often barely accommodates this.

2) No street parking for the vehicles that will be generated by new developments. The parking
requirements listed by a state code used by the Planning Department are totally inadequate for
multifamily housing:

3) The small short street (Prospect) with the POORLY DESIGNED ROUNDABOUT and
unworkable traffic flow on one of the two access roads into the neighborhood. The city has long
promised to run Fir through to Valentine Avenue when they build the park. It was promised again
when Leo Wilson built a large housing development adjacent to the park. Just this year it was
considered but then cancelled by Councilman Karbassi at the budget hearing. Jerry Dyer now
says those promises from the city are "too old."

4) Altered traffic patterns throughout the neighborhood as a result of people avoiding Prospect
and using Brawley Ave instead. Again, the city is adding higher density on each parcel
leading to roads through the neighborhood that were not designed to

handle that traffic. With
each new development the quality of life in the existing neighborhood has deteriorated.

5) School safety. There should be a direct path from both the existing new developments and
the proposed new ones for children to walk to their elementary school. The City Manager,
Georgeanne White says that, "they are not required to provide one." The neighborhood is
already choked with traffic at peak pick up and drop off times. It is not safe for children to
navigate alone which generates even more traffic.

6) Public Safety Vehicles . Ambulance and Fire Department vehicles have trouble navigating the
roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood
NOW.

7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood
was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning
engines, and just the heavier traffic can be heard blocks away.

8) Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on
proposed plans for new developments. This will exacerbate the congestion on these streets at
peak times and cause traffic to back up onto Herndon Avenue.

We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that
DO NOT WORK. These proposed developments will be permanent once they are built no matter
what problems they cause.

High density, multi-family housing has already been rejected by the Project Review Committee,
the Planning Commission, and by the City Council. This amendment would basically overturn
those decisions and ruin a neighborhood that already has apartments, townhomes and single family housing. This amendment
would negate the will of the people who have already prevailed on this issue.

This amendment will further erode the public's right to participate in addressing development
in their neighborhoods and should be denied.

Best regards

Scott Nichols and Janet Nichols
[redacted]

EMAIL: [redacted]

Subject: Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

To: Adrienne.Asadoorian@fresno.gov

I am writing to formally object to the Notice of Intent to Adopt a Mitigated Negative Declaration related to Parcel Number P24-00794, which is part of a citywide text code amendment. While this amendment affects multiple areas, its implications for our neighborhood are particularly concerning.

This amendment targets three parcels currently zoned for office use and potentially others, in addition to the one parcel already rezoned for high-density multifamily housing at Prospect and Herndon. That rezoning occurred during the 2015 holiday season with little to no input from affected residents. Unlike other districts, such as District 6, this area lacks adequate protections for parking and density concerns, leaving the community vulnerable to overdevelopment.

Specific Concerns:

1. **Lack of Planning and Neighborhood Consideration**:
   - Ministerial zoning that "meets the City's development code" disregards the unique needs and existing challenges in our neighborhood.
   - There has been no effort to consider how this amendment exacerbates ongoing issues such as traffic congestion, safety, and quality of life.
2. **Broken Promises and Community Frustration**:
   - Despite numerous emails, meetings, and petitions—most notably 929 signatures submitted in September 2021 and May 2024—the City has not addressed longstanding issues, including inadequate parking at Orchid Park, poor road infrastructure, and insufficient traffic mitigation measures.
3. **Traffic and Safety Concerns**:
   - The poorly designed roundabout on Prospect Street, coupled with inadequate access roads, already causes significant congestion. Increased density will only worsen these conditions.
   - There is no safe path for children walking to the local elementary school, further endangering students during peak traffic times.
   - Emergency vehicles such as ambulances and fire trucks struggle to navigate the neighborhood's current infrastructure.
4. **Environmental and Quality-of-Life Impacts**:
   - Increased noise and air pollution due to heavy traffic on Herndon Avenue directly affect residents' well-being.
   - The City's allowance for ingress and egress onto main feeder streets will further congest these roads and create backups onto Herndon.
5. **Lack of Transparency and Public Engagement**:
   - The City has failed to provide clear and timely communication about this amendment, raising concerns about its commitment to transparency.
   - High-density housing proposals have previously been rejected by the Project Review Committee, Planning Commission, and City Council. This amendment would overturn those decisions, disregarding the will of the community.

Conclusion:

This amendment undermines the public's right to participate in decisions about their neighborhoods and disregards the valid concerns of residents who have fought for responsible development. The proposed changes would impose permanent, detrimental impacts on our community; further eroding trust in the City's planning process.

I respectfully urge the City to reject this amendment. It is imperative that community voices are considered, and that thoughtful, transparent planning takes precedence over rushed policies.

Thank you for your attention to this matter.

Sincerely,

Name: DENNIS PERKINS

Address: [redacted]

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
Doris Ann Swaim	[redacted]
MARK SWAIM	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

To whom it may concern,

We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment.

This would affect three parcels in our neighborhood that are currently zoned for office and potentially a number of existing offices. We already have one parcel zoned for high density multi family. This parcel at Prospect and Herndon was rezoned as part of the 2030 rezone during the Holiday Season in 2015 with no input from nearby residents.

Steve Brandau did not protect his constituents with provisions to revisit parking and density like were done in District 6.

We object to the ministerial zoning that "meets the City's development code." There is no planning involved with this code. The Planning Department does not consider any existing or future problems that might be exacerbated by the development. The planners and city council do not consider the preservation and character of the neighborhood.

The City has created the problems that make multi family development in this neighborhood impractical. We have made the City aware of these problems on NUMEROUS occasions starting with emails to Councilman Karbassi in 2019. We have attended numerous meetings. We delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These signatures were attached to a document that noted:

1. Inadequate parking for Orchid Park. The parking was inadequate for what they planned the park to be from day 1. It should be noted that original property owners paid park fees and had to wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks have become regional parks." It should be noted that the Pickleball courts at Orchid Park are one of the most popular in the city. The parking lot often barely accommodates this.

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We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause.

If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the response was "was this something you received in the mail?" We never received any answer as to what this was going to do.

The City has refused to keep their promises. They refuse to fix the problems brought forth to them. They definitely are not transparent in their actions.

High density multi family housing has already been rejected by the Project Review Committee, the Planning Commission, and by the City Council. This amendment would basically overturn those decisions and ruin a neighborhood that already has all types of housing. This amendment would negate the will of the people who have already prevailed on this issue despite a secretive, abusive, and uneven playing ground.

As this amendment will further erode the public's right to participate in addressing development in their own communities it should be denied.

Thank you for your time,

Eugene Savarino & Lauren Savarino
[redacted]

Subject: Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

To: Adrienne.Asadoorian@fresno.gov

I am writing to formally object to the Notice of Intent to Adopt a Mitigated Negative Declaration related to Parcel Number P24-00794, which is part of a citywide text code amendment. While this amendment affects multiple areas, its implications for our neighborhood are particularly concerning.

This amendment targets three parcels currently zoned for office use and potentially others, in addition to the one parcel already rezoned for high-density multifamily housing at Prospect and Herndon. That rezoning occurred during the 2015 holiday season with little to no input from affected residents. Unlike other districts, such as District 6, this area lacks adequate protections for parking and density concerns, leaving the community vulnerable to overdevelopment.

Specific Concerns:

1. **Lack of Planning and Neighborhood Consideration**:
   - Ministerial zoning that "meets the City's development code" disregards the unique needs and existing challenges in our neighborhood.
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Conclusion:

This amendment undermines the public's right to participate in decisions about their neighborhoods and disregards the valid concerns of residents who have fought for responsible development. The proposed changes would impose permanent, detrimental impacts on our community; further eroding trust in the City's planning process.

I respectfully urge the City to reject this amendment. It is imperative that community voices are considered, and that thoughtful, transparent planning takes precedence over rushed policies.

Thank you for your attention to this matter.

Sincerely,

Name: [illegible] Address: [redacted]

Name: Lenore Schneider Address: [redacted]

Name: Lenore Schneider Address: _____

Name: _____ Address: _____

Name: _____ Address: _____

Name: _____ Address: _____

Name: _____ Address: _____

Name: _____ Address: _____

Name: _____ Address: _____

2907 S. Maple Avenue
Fresno, California 93725-2208
Telephone: (559) 233-7161
Fax: (559) 233-8227

CONVEYANCE. COMMITMENT. CUSTOMER SERVICE.

December 3, 2024

Adrienne Asadoorian
Planning and Development
City of Fresno
2600 Fresno Street, Third Floor
Fresno, CA 93721

RE: Text Amendment Application P24-00794

Dear Ms. Asadoorian:

The Fresno Irrigation District (FID) has reviewed Text Amendment Application P24-00794 which proposes an amendment to approve proposed office to dwelling conversion in the O zone district within existing buildings, multi-unit residential development in the RM-1, RM-2, and RM-3 zone districts (housing near bus stops), multi-unit residential uses in NMX, CMX, RMX, CMS, and CR zone districts (infill residential development in mixed use zones), new standalone multi-unit residential development in the O zone district (new residential development on office parcels). FID has the following comments and conditions:

Summary of Development Requirements Impacting FID Facilities:

- Review and Approval of all Plans/Maps
- Grant of Easement(s)
- Canal Bank/Pipeline Improvements
- Execute additional Agreement(s), if necessary
- Project Fees
- No Encroachments (i.e. trees, monuments, fences, PUE, etc.)

1. FID does not object to the amendment provided the City continues to require/support FID development requirements when impacted. FID would strongly oppose any amendment that would limit/restrict or otherwise hinder its ability to protect, utilize and maintain its facilities.

2. The proposed broadening of residential development may negatively impact local groundwater supplies. Under current circumstances the City of Fresno area is experiencing a modest but continuing groundwater overdraft. Should the proposed expansion of residential development result in a conversion from imported surface water to groundwater, this deficit will increase. FID suggests the City of Fresno require the residential developments balance anticipated groundwater use with sufficient recharge of imported surface water in order to preclude increasing the area's existing groundwater overdraft.

3. California enacted landmark legislation in 2014 known as the Sustainable Groundwater Management Act (SGMA). The act requires the formation of local groundwater sustainability agencies (GSAs) that must assess conditions in their local water basins and adopt locally-based management plans. FID and the City of Fresno are members of the North Kings Groundwater Sustainability Agency which will manage the groundwater basin within the FID service area. This area is completely reliant on groundwater pumping and SGMA will impact all users of groundwater and those who rely on it. The City of Fresno should consider the impacts of broadening residential development on the City's ability to comply with requirements of SGMA.

Thank you for submitting this for our review. We appreciate the opportunity to review and comment on the subject documents for the proposed project. If you have any questions, please feel free to contact Chris Lundeen at (559) 233-7161 extension 7410 or clundeen@fresnoirrigation.com.

Sincerely,

Laurence Kimura, P.E.
Chief Engineer

Attachment

OBJECTIONS

We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment.

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If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the response was "was this something you received in the mail?" We never received any answer as to what this was going to do.

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As this amendment will further erode the public's right to participate in addressing development in their own communities it should be denied.

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
Jeff and Valerie Dahl	[redacted]
Valerie Dahl	
Lark and Mike Hilliard	[redacted]
Lark Hilliard & Mike Hilliard	

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

OBJECTIONS

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Signature	Address
	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

By DECEMBER 20, 2024

December 11, 2024

Larry Fleming
[redacted]

To; Adrienne Asadoorian, City of Fresno

I would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city-wide text code amendment.

Sierra Sky Park is unique. It is the first community in the United States, ever built around aviation. It was built in 1946, far north of Fresno, with wide open spaces and farmland surrounding it. The founders of Sierra Sky Park built a community that safely promoted aviation and prevented any potential problems with a densely populated urban area**. It is important to remember that Sierra Sky Park was there first.** Fresno has grown over the many years and now borders Sierra Sky Park, slowly and surely encroaching on its way of life; aviation. Although I do not live at Sierra Sky Park, I like airplanes. I love seeing them land and take-off and so do many of my friends. We enjoy the day-to-day operation and events sponsored by the community of Sierra Sky Park. Sierra Sky Park is not just a place for pilots; it is also a place for the general public to watch and enjoy flying; a place where mom and dad take the kids to show them real airplanes, up close. My two sons were even invited to take a flight there when they were young. **Sierra Sky Park is one of Fresno's jewels.**

I am concerned to hear that there is a proposal to rezone land around Sierra Sky Park, which may threaten its operations. If this new zoning plan is approved, I believe it will set the scene for future conflict; expensive lawsuits, complaints, and possible safety issues. It will be a lose/lose situation for the Sky Park, for the residences of any new development, and for the City of Fresno. Why would the City of Fresno consider changing an already adopted land use plan; a costly plan that had been thoroughly studied, agreed upon and makes sense? **There are plenty of other places in our city to build apartments, but there is only one Sierra Sky Park.**

The Community of Sierra Sky Park realizes that the city will continue to grow and that stuff is going to be built around the airport. They only want to make sure that development goes according to the existing land use plan and will not threaten the core of the neighborhood; flying. I urge the City of Fresno to work with the people of Sierra Sky Park and only allow development around the airport that is consistent with the its ability to operate.

Sincerely,
Larry Fleming

RIVER PARK PROPERTIES III
Lance-Kashian & Company
265 E. River Park Circle, Suite 420
Fresno, California 93720
Phone (559) 438-4800 Facsimile (559) 438-4802

September 27, 2023 Via: Electronic Mail

Ms. Jennifer Clark, Director
City of Fresno, Development and Resource Management
2600 Fresno Street, Room 3043,
Fresno, CA 93721

Re: Proposal to Expand Development Code Amendment to Allow Multifamily Housing on Vacant Properties Planned and Zoned for Office Use

Dear Ms. Clark, Jennifer

I hope all is good with you as we enter the beautiful Fall weather. It is my understanding that the Development and Resource Management department is initiating a Development Code amendment that would permit multifamily residential development on properties planned and zoned for office uses. As I understand, the amendment is intended to apply to existing vacant office buildings only, and its primary purpose is to increase the availability of much needed housing in our community.

I would respectfully request that you consider expanding this amendment to allow multifamily housing on vacant properties planned and zoned for office uses. As a longtime experienced commercial property developer, owner, and manager and because of progressively changing office work habits and ever improving off-site work technology, I am convinced the City has an overabundance of planned future office space. I sincerely believe this proposal will maximize the use of vacant land and better help the city achieve its General Plan infill and housing goals while significantly reducing vehicle trips and air pollution. We have developed a site plan for a seven-story residential project at the intersection of Friant Road and Fresno Street and I would very much like to meet and present it to you. We understand that our proposal could be viewed as too broad, given the hundreds of vacant acres planned for office use. However, I believe the amendment can be structured to achieve the outcomes described above.

Thank you for your consideration of this request.

Sincerely,

Salvador Gonzales
President

SG/lc

cc: Mr. Edward M. Kashian

Subject: Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

To: Adrienne.Asadoorian@fresno.gov

I am writing to formally object to the Notice of Intent to Adopt a Mitigated Negative Declaration related to Parcel Number P24-00794, which is part of a citywide text code amendment. While this amendment affects multiple areas, its implications for our neighborhood are particularly concerning.

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Specific Concerns:

1. **Lack of Planning and Neighborhood Consideration**:
   - Ministerial zoning that "meets the City's development code" disregards the unique needs and existing challenges in our neighborhood.
   - There has been no effort to consider how this amendment exacerbates ongoing issues such as traffic congestion, safety, and quality of life.
2. **Broken Promises and Community Frustration**:
   - Despite numerous emails, meetings, and petitions—most notably 929 signatures submitted in September 2021 and May 2024—the City has not addressed longstanding issues, including inadequate parking at Orchid Park, poor road infrastructure, and insufficient traffic mitigation measures.
3. **Traffic and Safety Concerns**:
   - The poorly designed roundabout on Prospect Street, coupled with inadequate access roads, already causes significant congestion. Increased density will only worsen these conditions.
   - There is no safe path for children walking to the local elementary school, further endangering students during peak traffic times.
   - Emergency vehicles such as ambulances and fire trucks struggle to navigate the neighborhood's current infrastructure.
4. **Environmental and Quality-of-Life Impacts**:
   - Increased noise and air pollution due to heavy traffic on Herndon Avenue directly affect residents' well-being.
   - The City's allowance for ingress and egress onto main feeder streets will further congest these roads and create backups onto Herndon.
5. **Lack of Transparency and Public Engagement**:
   - The City has failed to provide clear and timely communication about this amendment, raising concerns about its commitment to transparency.
   - High-density housing proposals have previously been rejected by the Project Review Committee, Planning Commission, and City Council. This amendment would overturn those decisions, disregarding the will of the community.

Conclusion:

This amendment undermines the public's right to participate in decisions about their neighborhoods and disregards the valid concerns of residents who have fought for responsible development. The proposed changes would impose permanent, detrimental impacts on our community; further eroding trust in the City's planning process.
I respectfully urge the City to reject this amendment. It is imperative that community voices are considered, and that thoughtful, transparent planning takes precedence over rushed policies.
Thank you for your attention to this matter.

Sincerely,

Name: Susanne Heskett

Address: [redacted]

Subject: Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

To: Adrienne.Asadoorian@fresno.gov

I am writing to formally object to the Notice of Intent to Adopt a Mitigated Negative Declaration related to Parcel Number P24-00794, which is part of a citywide text code amendment. While this amendment affects multiple areas, its implications for our neighborhood are particularly concerning.

This amendment targets three parcels currently zoned for office use and potentially others, in addition to the one parcel already rezoned for high-density multifamily housing at Prospect and Herndon. That rezoning occurred during the 2015 holiday season with little to no input from affected residents. Unlike other districts, such as District 6, this area lacks adequate protections for parking and density concerns, leaving the community vulnerable to overdevelopment.

Specific Concerns:

1. **Lack of Planning and Neighborhood Consideration**:
    - Ministerial zoning that "meets the City's development code" disregards the unique needs and existing challenges in our neighborhood.
    - There has been no effort to consider how this amendment exacerbates ongoing issues such as traffic congestion, safety, and quality of life.
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Thank you for your attention to this matter.

Sincerely,

Name: Peter Nunez Address: [redacted]

OBJECTIONS

We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment.

This would affect three parcels in our neighborhood that are currently zoned for office and potentially a number of existing offices. We already have one parcel zoned for high density multi family. This parcel at Prospect and Herndon was rezoned as part of the 2030 rezone during the Holiday Season in 2015 with no input from nearby residents.
Steve Brandau did not protect his constituents with provisions to revisit parking and density like were done in District 6.

We object to the ministerial zoning that "meets the City's development code." There is no planning involved with this code. The Planning Department does not consider any existing or future problems that might be exacerbated by the development. The planners and city council do not consider the preservation and character of the neighborhood.

The City has created the problems that make multi family development in this neighborhood impractical. We have made the City aware of these problems on NUMEROUS occasions starting with emails to Councilman Karbassi in 2019. We have attended numerous meetings. We delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These signatures were attached to a document that noted:
1) Inadequate parking for Orchid Park. The parking was inadequate for what they planned the park to be from day 1. It should be noted that original property owners paid park fees and had to wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks have become regional parks." It should be noted that the Pickleball courts at Orchid Park are one of the most popular in the city. The parking lot often barely accommodates this.
2) No street parking for the vehicles that will be generated by new developments. The parking requirements listed by a state code used by the Planning Department are totally inadequate for multi family housing.
3) The small short street (Prospect) with the POORLY DESIGNED ROUNDABOUT and unworkable traffic flow on one of the two access roads into the neighborhood. The city has long promised to run Fir through to Valentine Avenue when they build the park. It was promised again when Leo Wilson built a large housing development adjacent to the park. Just this year it was considered but then cancelled by Councilman Karbassi at the budget hearing. Jerry Dyer now says those promises from the city are "too old."
4) Altered traffic patterns throughout the neighborhood as a result of people avoiding Prospect

and using Brawley Avenue instead. Again the city is adding higher density on each parcel leading to roads through the neighborhood that were not designed to handle that traffic. With each new development the quality of life in the existing neighborhood has deteriorated.

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7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning engines, and just the heavier traffic can be heard blocks away.

8) Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on proposed plans for new developments. This will exacerbate the congestion on these streets at peak times and cause traffic to back up onto Herndon Avenue.

We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause.

If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the response was "was this something you received in the mail?" We never received any answer as to what this was going to do.

The City has refused to keep their promises. They refuse to fix the problems brought forth to them. They definitely are not transparent in their actions.

High density multi family housing has already been rejected by the Project Review Committee, the Planning Commission, and by the City Council. This amendment would basically overturn those decisions and ruin a neighborhood that already has all types of housing. This amendment would negate the will of the people who have already prevailed on this issue despite a secretive, abusive, and uneven playing ground.

As this amendment will further erode the public's right to participate in addressing development in their own communities it should be denied.

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
Matt Stifter	[redacted]
Rai Sturgeon	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

Subject: Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

To: Adrienne.Asadoorian@fresno.gov

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Specific Concerns:

1. **Lack of Planning and Neighborhood Consideration**:
   - Ministerial zoning that "meets the City's development code" disregards the unique needs and existing challenges in our neighborhood.
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Conclusion:

This amendment undermines the public's right to participate in decisions about their neighborhoods and disregards the valid concerns of residents who have fought for responsible development. The proposed changes would impose permanent, detrimental impacts on our community; further eroding trust in the City's planning process.

I respectfully urge the City to reject this amendment. It is imperative that community voices are considered, and that thoughtful, transparent planning takes precedence over rushed policies.

Thank you for your attention to this matter.

Sincerely,

Name: MIKE KIDD Address: [redacted]

Name: JANET KIDD Address:

Name: Address:

Name: Address:

Name: Address:

Name: Address:

Name: Address:

Name: Address:

Name: Address:

Name: Address:

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Name: Address:

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Thank you for your attention to this matter.

Sincerely,

Name: Roberta Nasto Address: [redacted]

Name: Address: [redacted]

Name: Address:

Name: Address:

Name: Address:

Name: Address:

Name: Address:

Name: Address:

Name: Address:

Name: Address:

Name: Address:

Name: Address:

Name: Address:

Name: Address:

Name: Address:

From: [redacted]
To: Adrienne Asadoorian
Subject: I Object to the city"s intent about Parcel Number P24-00794
Date: Tuesday, December 10, 2024 9:48:31 PM

External Email: Use caution with links and attachments

I couldn't say it better than the Objections listed below, written by my neighbor.
I agree with all these points.

Particularly, I find it unscrupulous to try to push these zoning issues through at holiday time. I think "Shame on you."

OBJECTIONS
We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed
with Parcel Number P24-00794 even though it is a city wide text code amendment.
This would affect three parcels in our neighborhood that are currently zoned for office and
potentially a number of existing offices. We already have one parcel zoned for high density
multi family. This parcel at Prospect and Herndon was rezoned as part of the 2030 rezone
during the Holiday Season in 2015 with no input from nearby residents.
Steve Brandau did not protect his constituents with provisions to revisit parking and density like
were done in District 6.
We object to the ministerial zoning that "meets the City's development code." There is no
planning involved with this code. The Planning Department does not consider any existing or
future problems that might be exacerbated by the development. The planners and city council
do not consider the preservation and character of the neighborhood.
The City has created the problems that make multi family development in this neighborhood
impractical. We have made the City aware of these problems on NUMEROUS occasions starting
with emails to Councilman Karbassi in 2019. We have attended numerous

meetings. We
delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These
signatures were attached to a document that noted:
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wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged
this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks
have become regional parks." It should be noted that the Pickleball courts at Orchid Park are
one of the most popular in the city. The parking lot often barely accommodates this.
2) No street parking for the vehicles that will be generated by new developments. The parking
requirements listed by a state code used by the Planning Department are totally inadequate for
multi family housing:
3) The small short street (Prospect) with the POORLY DESIGNED ROUNDABOUT and
unworkable traffic flow on one of the two access roads into the neighborhood. The city has long
promised to run Fir through to Valentine Avenue when they build the park. It was promised again
when Leo Wilson built a large housing development adjacent to the park. Just this year it was
considered but then cancelled by Councilman Karbassi at the budget hearing. Jerry Dyer now
says those promises from the city are "too old."
4) Altered traffic patterns throughout the neighborhood as a result of people avoiding Prospect
and using Brawley Avenue instead. Again the city is adding higher density on each parcel
leading to roads through the neighborhood that were not designed to handle that traffic. With
each new development the quality of life in the existing neighborhood has deteriorated.
5) School safety. There should be a direct path from both the existing new developments and
the proposed new ones for children to walk to their elementary school. The City Manager,

Georgeanne White says that, "they are not required to provide one." The neighborhood is
already choked with traffic at peak pick up and drop off times. It is not safe for children to
navigate alone which generates even more traffic.
6) Public Safety Vehicles. Ambulance and Fire Department vehicles have trouble navigating the
roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood
NOW.
7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood
was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning
engines, and just the heavier traffic can be heard blocks away.
8) Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on
proposed plans for new developments. This will exacerbate the congestion on these streets at
peak times and cause traffic to back up onto Herndon Avenue.
We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that
DO NOT WORK. These proposed developments will be permanent once they are built no matter
what problems they cause.
If this amendment is such a good idea, why has the City gone to such great lengths to keep this
from the public. When Councilman Karbassi was asked about this notice the response was "was
this something you received in the mail?" We never received any answer as to what this was
going to do.
The City has refused to keep their promises. They refuse to fix the problems brought forth to
them. They definitely are not transparent in their actions.
High density multi family housing has already been rejected by the Project Review Committee,
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those decisions and ruin a neighborhood that already has all types of housing. This amendment
would negate the will of the people who have already prevailed on this issue despite a secretive,

abusive, and uneven playing ground.
As this amendment will further erode the public's right to participate in addressing development
in their own communities it should be denied.

--
Nadine Brubaker Howell
Fresno, CA

From: [redacted]
To: Adrienne Asadoorian
Subject: Notice of Intent to Adopt a Mitigated Negative Declaration regarding Parcel P24-00794
Date: Saturday, December 14, 2024 10:46:01 AM

External Email: Use caution with links and attachments

[redacted]

December 14, 2024

RE: Notice of Intent to Adopt a Mitigated Negative Declaration regarding Parcel P24-00794

Dear Ms. Asadoorian:

I am writing to object to the Notice of Intent to Adopt a Mitigated Negative Declaration regarding Parcel P24-00794 and the reconsideration of Building App. No. P21-00989 that previously failed to gain approval by Project Review Committee, the Fresno Planning Commission, and the City Council for numerous problematic issues.. The 82 unit 3 and 4 story apartment complex at Herndon Avenue and N. Prospect Avenue as proposed should not be built as currently planned for a number of significant reasons that present several potential risks and liability for future residents of the facility.

These include:

1. Building evacuation in case of fire,
2. Access to the proposed project off Prospect by the fire department,
3. Safe pedestrian pathways from the proposed project to the H. Roger Tatarian elementary school,
4. Increased traffic thru the poorly configured and too small traffic circle on Prospect, north of Herndon, and
5. Inadequate parking spaces for the proposed complex.

The developer's representative at the Planning Commission meeting stated that the target clientele of the proposed project would be senior citizens. Many elderly individuals have limited mobility and some seniors are easily confused when placed in stressful situations, particularly if they have mild dementia. During a building evacuation because of fire when elevator use is prohibited, many senior citizens may be unable to quickly negotiate third and fourth floor stairways to move to safety outside the buildings. In addition , the four-story portion will not have windows on the eastern side of the building thereby limiting rescue access by firefighters using ladder trucks.

N. Prospect Avenue itself is too narrow at the level of the tiny turn-around circle to accommodate a pickup truck towing a moderate-sized trailer. I question the ability of a fire ladder truck to negotiate a turn into the proposed complex especially if and when facility residents are attempting to move their vehicles to safety. These difficulties would certainly delay both fire fighter evacuations of facility residents and delay implementation of fire fighting efforts.

Despite the developer's belief that the proposed complex would be largely inhabited by senior citizens, one must assume that given its proximity to an elementary school, any number of families with children would also be residents of the complex. Safe pedestrian pathways do not exist currently between the proposed complex and H. Roger Tatarian elementary school; rather children would need to either walk along the gravel shoulder of the narrow two lane portion of N. Valentine Avenue that parallels Herndon Avenue or traverse the open field north of that side road. Placing those young children at risk from drivers hurrying to work along the already congested road seems unwise when increased traffic along N. Prospect from the proposed complex must be assumed.

The poorly designed connection of N. Valentine Avenue to Herndon Avenue, where N. Valentine becomes a frontage road that enters Prospect Avenue from the West, has already created a significant obstacle to the smooth flow of traffic from N. Valentine onto Herndon Avenue. Complicating the flow of traffic further at N. Prospect and Herndon by adding additional traffic from an 82 unit apartment complex will lead to undue congestion and innumerable fender-bender accidents along N. Prospect.

One must expect that most of the target clientele (senior citizens) of the proposed project will be moving into the apartments to "down-size" their remaining years and will have two vehicles or the residents will be working parents with two vehicles. The proposed

apartment complex does not have adequate parking facilities to accommodate even 150 vehicles, much less 164 cars and trucks. Local street parking lacks the capacity to support more than a few extra vehicles.

May I suggest that several changes be made to either or both the proposed complex or the surrounding street traffic infrastructure. Certainly, anticipating the numerous problems noted above and providing solutions prospectively would seem wise. I remember that the traffic signal at Marks and Herndon Avenue was constructed to replace the 4-way stop signs only after a Supervisor's teenage daughter was killed in a traffic accident at that intersection. Prospectively dealing with the above mentioned problems might save lives in the future.

I humbly suggest several potential solutions:

1. Down-size the proposed project to a maximum of two-story buildings
2. Move the entrance and exit from the proposed complex to W. Fir Avenue instead of N. Prospect Avenue.
3. Widen the frontage road portion of N. Valentine Avenue that parallels Herndon Avenue and add a sidewalk along the northern portion of that road and along N. Prospect Avenue while widening N. Prospect Avenue itself along with the construction of a larger traffic turning circle to N. Prospect Avenue.
4. Maintain or increase the number of parking spaces in the proposed complex despite down-sizing the number of proposed housing units themselves.

These corrective suggestions surely might be implemented by either the city or the developer of Parcel Number P24-00794 if the City of Fresno were concerned for any future residents of any development project on the aforementioned parcel of land.

In conclusion, I strenuously object to the Notice of Intent to Adopt a Mitigated Negative Declaration as a city wide code amendment and more specifically for application of any such declaration in regard to Parcel Number P24-00794 for the reasons stated above because development of the parcel per Building App. No. P21-00989 without significant corrective measures would place future resident adults and their children at significant risk of injury.

Yours Sincerely,

Virgil M. Airola

From: [redacted]
To: Adrienne Asadoorian
Cc: [redacted]
Subject: Objection to the Notice of Intent re:Parcel#P24-00794
Date: Saturday, December 14, 2024 2:38:00 PM

External Email: Use caution with links and attachments

Please see attached letter. Thank you for your assistance and consideration.

OBJECTIONS

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Signature	Address
	[redacted]
	[redacted]
	[redacted]

From: [redacted]
To: Adrienne Asadoorian
Cc: [redacted]
Subject: Objection to the Notice of Intent to Adopt a Mitigated Negative Declaration
Date: Tuesday, December 17, 2024 1:54:44 PM
Attachments: Objection Signatures.pdf

External Email: Use caution with links and attachments

We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. This would affect three parcels in our neighborhood that are currently zoned for office and potentially a number of existing offices. We already have one parcel zoned for high density multi family. This parcel at Prospect and Herndon was rezoned as part of the 2030 rezone during the Holiday Season in 2015 with no input from nearby residents. Steve Brandau did not protect his constituents with provisions to revisit parking and density like were done in District 6. We object to the ministerial zoning that "meets the City's development code." There is no planning involved with this code. The Planning Department does not consider any existing or future problems that might be exacerbated by the development. The planners and city council do not consider the preservation and character of the neighborhood. The City has created the problems that make multi family development in this neighborhood impractical. We have made the City aware of these problems on NUMEROUS occasions starting with emails to Councilman Karbassi in 2019. We have attended numerous meetings. We delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These signatures were attached to a document that noted: 1) Inadequate parking for Orchid Park. The parking was inadequate for what they planned the park to be from day 1. It should be noted that original property owners paid park fees and had to wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks have become regional parks." It should be noted that the Pickleball courts at Orchid Park are one of the most popular in the city. The parking lot often barely accommodates this. 2) No street parking for the vehicles that will be generated by new developments. The parking requirements listed by a state code used by the Planning Department are totally inadequate for multi family housing:
3) The small short street (Prospect) with the POORLY DESIGNED ROUNDABOUT and unworkable traffic flow on one of the two access roads into the neighborhood. The city has long promised to run Fir through to Valentine Avenue when they build the park. It was promised again when Leo Wilson built a large housing development adjacent to the park. Just this year it was considered but then cancelled by Councilman Karbassi at the budget hearing. Jerry Dyer now says those promises from the city are "too old.") Altered traffic patterns throughout the neighborhood as a result of people avoiding Prospect and using Brawley Avenue instead. Again, the city is adding higher density on each parcel leading to roads through the neighborhood that were not designed to handle that traffic. With each new development the quality of life in the existing neighborhood has deteriorated. 5) School safety. There should be a direct path from both the existing new developments and the proposed new ones for children to walk to their elementary school. The City Manager, Georgeanne White says that, "they are not required to provide one." The neighborhood is already choked with traffic at peak pick up and drop off times. It is not safe for children to navigate alone which generates even more traffic. 6) Public Safety Vehicles. Ambulance and Fire Department vehicles have trouble navigating the roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood NOW. 7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning engines, and just the heavier traffic can be heard blocks away. 8) Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on proposed plans for new developments. This will exacerbate the congestion on these streets at peak times and cause traffic to back up onto Herndon Avenue. We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause. If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the

response was "was this something you received in the mail?" We never received any answer as to what this was going to do. The City has refused to keep their promises. They refuse to fix the problems brought forth to them. They definitely are not transparent in their actions.
We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause. If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the response was "was this something you received in the mail?" We never received any answer as to what this was going to do. The City has refused to keep their promises. They refuse to fix the problems brought forth to them. They definitely are not transparent in their actions. High density multi family housing has already been rejected by the Project Review Committee, the Planning Commission, and by the City Council. This amendment would basically overturn those decisions and ruin a neighborhood that already has all types of housing. This amendment would negate the will of the people who have already prevailed on this issue despite a secretive, abusive, and uneven playing ground. As this amendment will further erode the public's right to participate in addressing development in their own communities it should be denied.
Please see the attached signature page.

Thank you,

Ulysses Caiati, President
Sierria Sky Park Property Owners Association

From: [redacted]
To: Adrienne Asadoorian
Subject: Parcel Number P24-00794
Date: Monday, December 9, 2024 3:39:15 PM
Attachments: San Joaquin Neighbors Comments.docx

External Email: Use caution with links and attachments

Subject: Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

To: **Adrienne.Asadoorian@fresno.gov**

I am writing to formally object to the Notice of Intent to Adopt a Mitigated Negative Declaration related to Parcel Number P24-00794, which is part of a citywide text code amendment. While this amendment affects multiple areas, its implications for our neighborhood are particularly concerning.

This amendment targets three parcels currently zoned for office use and potentially others, in addition to the one parcel already rezoned for high-density multifamily housing at Prospect and Herndon. That rezoning occurred during the 2015 holiday season with little to no input from affected residents. Unlike other districts, such as District 6, this area lacks adequate protections for parking and density concerns, leaving the community vulnerable to overdevelopment.

Specific Concerns:

1. **Lack of Planning and Neighborhood Consideration**:
   - Ministerial zoning that "meets the City's development code" disregards the unique needs and existing challenges in our neighborhood.
   - There has been no effort to consider how this amendment exacerbates ongoing issues such as traffic congestion, safety, and quality of life.
2. **Broken Promises and Community Frustration**:
   - Despite numerous emails, meetings, and petitions—most notably 929 signatures submitted in September 2021 and May 2024—the City has not addressed longstanding issues, including inadequate parking at Orchid Park, poor road infrastructure, and insufficient traffic mitigation measures.
3. **Traffic and Safety Concerns**:
   - The poorly designed roundabout on Prospect Street, coupled with inadequate access roads, already causes significant congestion. Increased density will only worsen these conditions.
   - There is no safe path for children walking to the local elementary school, further endangering students during peak traffic times.
   - Emergency vehicles such as ambulances and fire trucks struggle to navigate the neighborhood's current infrastructure.
4. **Environmental and Quality-of-Life Impacts**:
   - Increased noise and air pollution due to heavy traffic on Herndon Avenue directly affect residents' well-being.
   - The City's allowance for ingress and egress onto main feeder streets will further congest these roads and create backups onto Herndon.
5. **Lack of Transparency and Public Engagement**:
   - The city has failed to provide clear and timely communication about this amendment, raising concerns about its commitment to transparency.
   - High-density housing proposals have previously been rejected by the Project Review Committee, Planning Commission, and City Council. This amendment would overturn those decisions, disregarding the will of the community.

Conclusion:

This amendment undermines the public's right to participate in decisions about their neighborhoods and disregards the valid concerns of residents who have fought for responsible development. The proposed changes would impose permanent, detrimental impacts on our community; further eroding trust in the City's planning process.
I respectfully urge the city to reject this amendment. It is imperative that community voices are considered, and that thoughtful, transparent planning takes precedence over rushed policies.

Thank you for your attention to this matter.

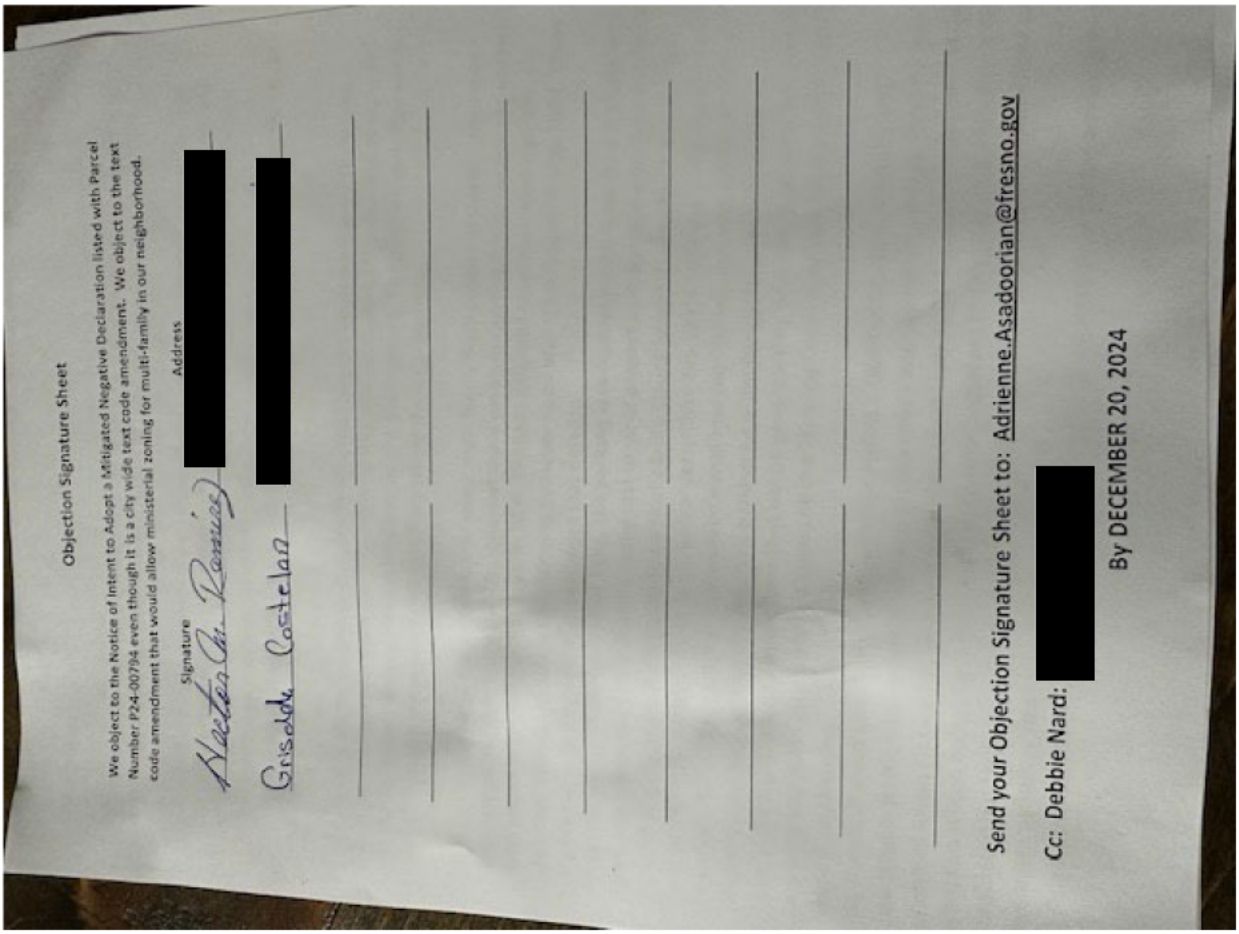
Sincerely,

Name: Peter Nunez (signed copy is attached) Address: [redacted]

Peter Núñez
President
General Teamsters Local 431

From: [redacted]
To: Adrienne Asadoorian
Date: Monday, December 16, 2024 7:25:29 PM

External Email: Use caution with links and attachments



Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
Hector A. Ramirez	[redacted]
Griselda Castelan	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

Sent from my iPhone

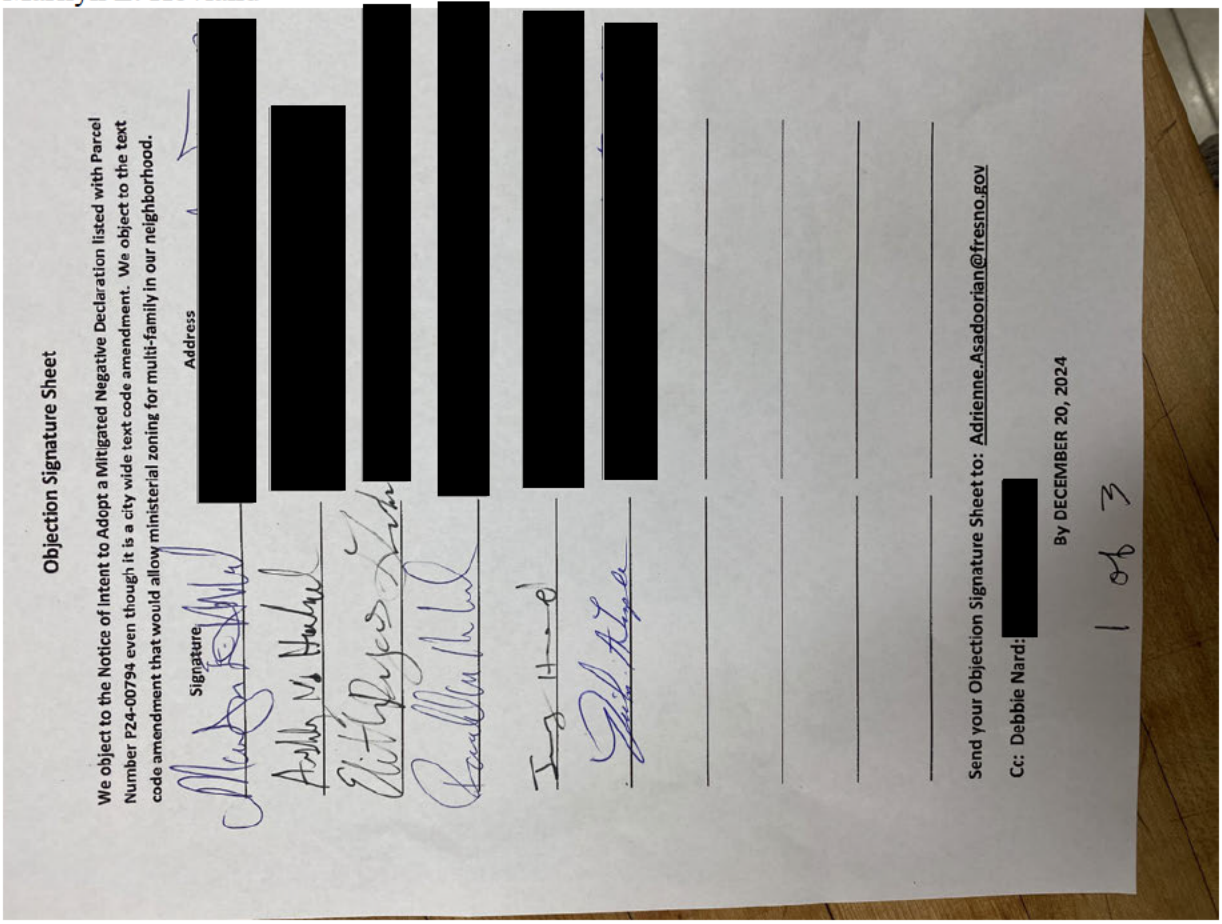
From: [redacted]
To: Adrienne Asadoorian
Cc: [redacted]
Subject: Resending updated signature page
Date: Monday, December 16, 2024 2:59:29 PM

External Email: Use caution with links and attachments

I had another neighbor that stopped by to sign the objection signature sheet for P24-00794. Please add it to my letter sent earlier today, 12/16/24

Regards,

Marilyn E. Hovland



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Signature	Address
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

1 of 3

Sent from the all new AOL app for iOS

From: [redacted]
To: [redacted]
Subject: COMMENT - Development Code Text Amendment No. P24-00794
Date: Wednesday, December 11, 2024 1:35:51 PM
Attachments: O zoning2.docx

External Email: Use caution with links and attachments

Dear Adrienne Asadoorian,

I'd like to submit a comment in opposition of Development Code Text Amendment No. P24-00794. I have added it as an attachment and also pasted a copy below in case the attachment does not open.

Please let me know if I need to send the comment somewhere else or if you have any questions.

Thanks,
Kimberly Sabna
[redacted]

December 11, 2024

Dear Planning Commission,

I am writing today in opposition of amendment P24-00794. I commend Fresno's work to increase housing overall and increase city infill, however I do not agree that changing O zoning regulations to include RM-3 units to be best for the city. On Page 1, I will outline my concerns in general and on Page 2, I will demonstrate how a blanket conversion could play out in my neighborhood.

I would love to see Fresno transformed from a sprawling, car-reliant society to a walkable city so much so I even dream about our canal banks being transformed into beautiful walking trails. I do not believe that changing zoning of O to allow RM-3 achieves this goal.

One question I have is, why was the decision made to change O to RM-3 instead of RM-1 or RM-2 or allowing the owner to decide RM-1, 2 or 3 based on lot size and location? Why wasn't CMX or RMX chosen instead? RM-3 adds only more housing to neighborhoods. It does not make a neighborhood more walkable. Using CMX or RMX would encourage decreased reliance on cars as people living above, and in close neighborhoods, could easily walk to offices and businesses below. By allowing bars and restaurants under housing, Fresno could also decrease incidence of DUI.

When I think about office-to-dwelling conversions or allowing new stand-alone multi-unit residential development in O zoned parcels, I immediately have many concerns.

One concerns is the safety of families living in these units. Some O lots/buildings are among other currently underutilized O lots. While the new residential units may have some parking and sidewalks, will the adjoining lots continue the sidewalks? If only a small lot is converted, will any changes be made to roads and crosswalks?

I worry about parks—or lack thereof. These O zoned areas also tend to have fewer parks. If lots are converted to RM-3, there will be a lot of people, including families with children, added to the neighborhood. Will the developer be required to set apart space for a park? Will children be forced to play in parking areas, streets or vacant lots near the converted O lot/business?

I worry about schools. Are the districts prepared for the influx of students and traffic that this blanket conversion could allow? Are the roads in O zones ready for school foot traffic, again, do they have sidewalks, crosswalks, etc?

I worry about traffic and congestion. One office lot may have a little to a lot of traffic, but adding 30-45 units per acre surely will increase traffic. Is every conversion or new project required consider this or will it be left for the city to figure out after the fact? It seems the proposal only requires traffic considerations for larger projects, but multiple small project could be done at once and have the same effect on traffic and congestion as one large project.

I also wonder how this plays out for office complexes that are composed of multiple parcels sometimes owned by different entities. Can one office building in an existing complex decide to convert to multifamily residential? Complex bylaws likely wouldn't have provisions for this as it was not previously allowed.

A Neighborhood Consideration:

To understand the effect the proposal may have on neighborhoods, I started first in near my own neighborhood. Here I have selected several parcels to illustrate:

500280345 is a 7.41 acre parcel zoned O at 7080 N. Valentine. This is between Herndon Ave on the south and Tatarian Elementary on the north. 501142018, 501142075 and 501152015 are vacant O-zoned vacant lots along Beachwood Ave between Brawley and Valentine. They are each between 1-1.5 acres. There are 4 additional O zoned lots with current office buildings along Beachwood as well. (See attachment 1)

- The 7.41 acre lot alone could add 222-333 housing units. (Blue)
- Together the vacant O lots along Beachwood could add 139 - 208 housing units. (Blue)
- The 4 current office lots could be converted doubling this to 278- 416 units. (Purple)
- All of these lots could turn into a total of 500-749 units.
- This is in addition to the 3.65 acres at Fir/Prospect which is already slated to become 82 apartment units pending the outcome of the lawsuit with Huckkamp.

The points of entry to these lots are either from Brawley avenue on the west and from Valentine on the east. (See attachment 2). Beachwood avenue itself is lined with two islands down the center and is already very narrow with street parking. Valentine/Prospect traffic is directed north to a very small roundabout which directs traffic back south to a narrow two-lane frontage road along Herndon before turning north where traffic is congested by Tatarian Elementary and can also turn left onto Beachwood.

Unlikely most other areas of Fresno, neighborhoods north of Herndon and west of Palm have unreliable east-west connecting roads and instead rely on connectors to funnel traffic down to Herndon.

Brawley is already the main entry point to homes to 275 homes to the north, plus 74 homes, 68 apartments and the office of United Health Care to the west on Beachwood. It is the ONLY entry point to the homes, apartments and business along Beachwood as well as the eastern half of Sierra Skypark.

Valentine/Prospect would be the main point of entry to another 150-200 homes north of Tatarian Elementary (this is only half of the homes north of Tatarian and Orchid Park, the other half of traffic could more easily enter from Marks). Huckkamp's project on Fir/Prospect will also increase traffic exiting Valentine to Herndon.

Allowing the conversion of O lots between Brawley and Valentine could *more than double the number of families living in this area.*

Here are my concerns with the conversion of just these lots alone:

- Increased traffic.
  a. Without the addition of RM-3 multifamily units, traffic is already congested and limited on Beachwood and Valentine due to existing housing and Tatarian elementary school. There are no "main arteries" or collectors through this neighborhood.
  b. The frontage road of Valentine funnels into south Prospect at the light at Herndon. Traffic waiting at the light to go south on Valentine/Prospect backs up onto the frontage road. The frontage road's location already cannot handle current residential and school traffic.
     i. A new road would need to be constructed south of the school and existing home to make Beachwood run through connecting to Fir. (Attachment 1 - red line). There is no way the existing roads could accommodate this amount of traffic. Does the current proposal contain guardrails that would require roads to be improved (in this case to move roads completely)?
     ii. WHO WOULD ENSURE the roads can accommodate increased traffic? WHO WOULD PAY for construction or improvement of new or current roads?
  c. Increased vehicle and foot traffic to school.
     i. Traffic around Tatarian Elementary is already more congested than most schools due to its position off a main artery road, meaning traffic cannot easily enter and exit during drop-off and pick-ups.
- Decreased or compromised emergency response time and evacuation
  a. With the increase in traffic, emergency response time for fire, police, ambulance could be delayed.
  b. In the case of a natural disaster requiring evacuation—ie a large fire along the river, which could easily spread into the neighborhood—would people be able to evacuate?
     i. As stated above, there are no main arteries or collectors through this neighborhood, some streets have only one outlet. Allowing conversion of O lots could more than double the amount of families and cars making a disaster unsafe for current residents.
- Increased school enrollment.
  a. What number of families would be added to this neighborhood? Could Tatarian Elementary accommodate this increased number of students? Could Tatarian Elementary and the neighborhood to the north accommodate the increased amount of traffic? As stated above, converting just these 8 O lots could more than double the current population.

As you can see from the above considerations, there are already multiple issues that arise with changing the zoning ordinance to allow RM-3 multi-family housing on all existing "O" zoned lots. I've only had time to look at one neighborhood, but I can imagine that neighborhoods all around Fresno would have some of the same issues as well as other issues of their own. I worry that making a blanket statement to change the zoning could cause unexpected problems and undue stress on existing neighborhoods.

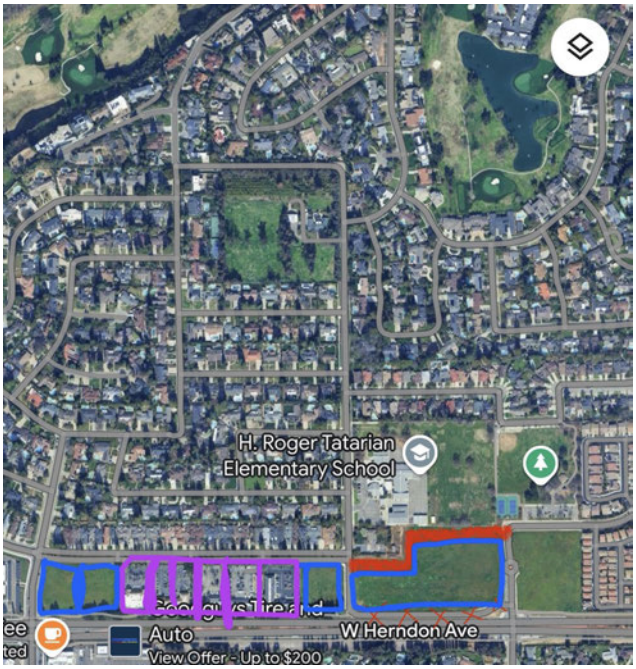
To conclude, I strongly oppose allowing office-to-dwelling conversions or new standalone multi-unit residential development in the O zoned district. I believe changes to the O zoning would be best made on a case-by-case basis or one neighborhood at a time.

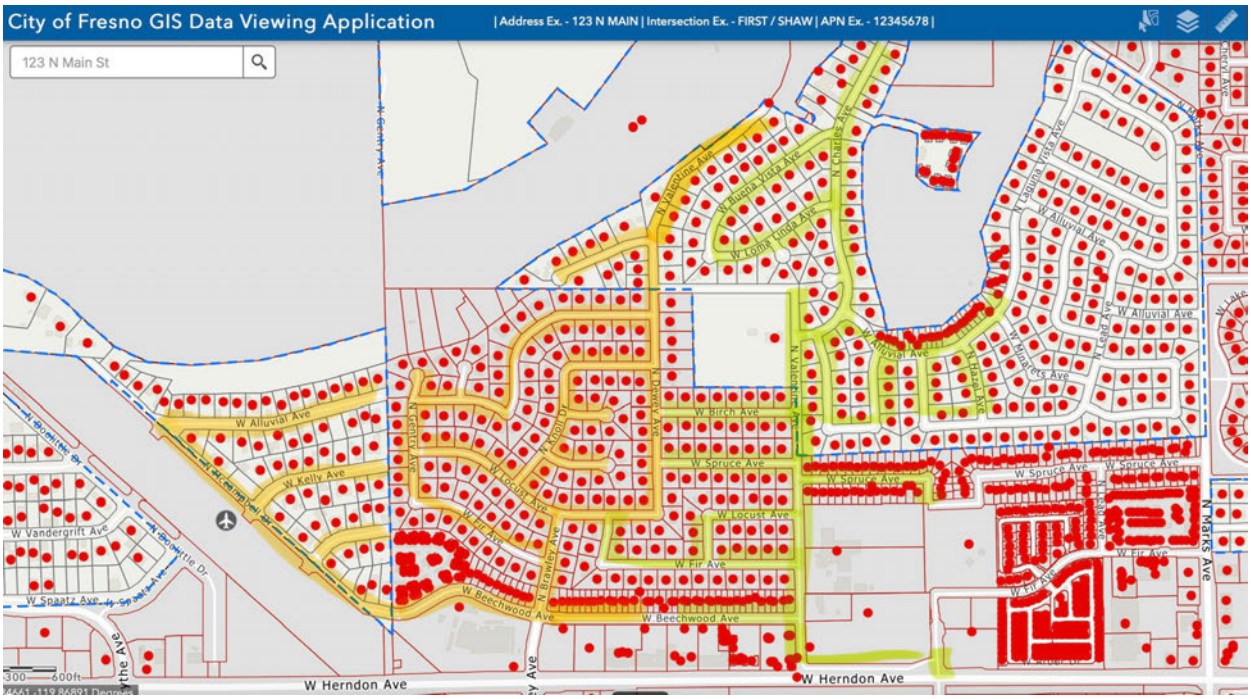
Thank you for your time and service,

Kimberly Sabna
[redacted]

Attachment 1:
Map view of area north of Herndon between Brawley and Valentine/Prospect.
Blue: Vacant Lots currently zoned as O
Purple: Lots currently zoned O with office buildings
Red Line: My proposed route for new road to accommodate existing and future traffic

Attachment 2:
Map area north of Herndon between Blythe and Marks.
Yellow: Roads that outlet mainly to Brawley
Green: Roads that outlet mainly to Valentine/Prospect
Note that there are no main arteries or connectors in this area.




City of Fresno GIS Data Viewing Application
| Address Ex. - 123 N MAIN | Intersection Ex. - FIRST / SHAW | APN Ex. - 12345678 |
123 N Main St
W Alluvial Ave
W Kelly Ave
W Vandergrift Ave
W Spaatz Ave
N Sunnyside Dr
N Valentine Ave
W Buena Vista Ave
W Loma Linda Ave
N Charles Ave
N Laguna Vista Ave
N Knoll Dr
N Brawley Ave
W Birch Ave
W Spruce Ave
W Locust Ave
W Fir Ave
W Beechwood Ave
N Marks Ave
W Herndon Ave
300 600ft

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

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Signature	Address
	[redacted]
	[redacted]
Raol Andrade	[redacted]
Darrel Dekus	[redacted]
Linda Manly	[redacted]
	[redacted]
Anthony Dow	[redacted]
Murray Kennedy	[redacted]
Carolyn Andersson	[redacted]
	[redacted]

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Signature	Address
Joyce A. Bailey	[redacted]
Brad Hay	
Valerie Goyn	
Michelle Lopez	
Linda Jones	
Roberto T. DeSoto	
Patricia Wayder	
Mitch Mathews	
Sharon Beasley	
[illegible]	

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Signature	Address
Carol T. Mously	[redacted]
Cynthia Ilca	
Joe O'Cole	
Barbara Cof	
Mary Kaufm	
[illegible]	
[illegible]	
[illegible]	
[illegible]	
Melissa Dempsey	

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Signature	Address
Jack Miller	[redacted]
Linda J Boaen	
Jillian gorman	
Debbie Whitly	
Kirk Whitney	
Gail Dorra	
[illegible]	
[illegible]	
[illegible]	

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Signature	Address
Joseph A. Lamanna	[redacted]
[illegible]	
[illegible]	
[illegible]	
[illegible]	
Jayne E McClung	
Ashley Dupreschle	
Mary L Tifer	
[illegible]	
Wayne McKaman	

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Signature	Address
	[redacted]
Jennifer Owens	
Megan Cardwell	
Anthony Pombo	
Chris Ens	
Mark Vaughan	

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Signature	Address
[illegible]	[redacted]
Nancy Decker	
Bill Decker	
Jennifer Wynveen	
Kathy Moch	
Mark Moch	
[illegible]	
Kristin [illegible]	
Kalyn [illegible]	
[illegible]	

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Signature	Address
	[redacted]

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Signature	Address
[redacted]	

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Signature	Address
[illegible]	[redacted]
[illegible]	
Sarah Kolatka	
Sera Monaco	
Sean [illegible]	
[illegible]	

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

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Signature	Address
[illegible]	[redacted]
[illegible]	
[illegible]	
[illegible]	
Christine Monaghan	
[illegible]	
[illegible]	
Kurt Billingsley	
[illegible]	
Kathleen Browning	

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

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Signature	Address
Elia Dusi	[redacted]

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Signature	Address
Catherine H. Christenson	[redacted]
Ryan H Christenson	
Joshua D Christenson	
Annette Christenson	
Patricia Meyer	
Sandra Hempel	
Varoujan Astbarmakis	
[illegible]	
Harvey H Christen	

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Cc: Debbie Nard: [redacted]

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Signature	Address
Tammy L Beard	[redacted]
[redacted]	
Megan Chabala	
Beth Pound	
Tripp M. Bond	
[redacted]	
[redacted]	
[redacted]	
Kenneth Chamberlain	
Milena Bustos	

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Cc: Debbie Nard: [redacted]

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Signature	Address
[illegible]	[redacted]
[illegible]	
[illegible]	
[illegible]	
[illegible]	
Dawn Peel	
[illegible]	
[illegible]	
Greg Crowley	
GUSTAVO BUSTOS	

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

By DECEMBER 20, 2024

Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature	Address
Anne Heregian	[redacted]
Deb Nance	
[illegible]	
Larry DeSoto	
Denise De Soto	
Linda C. Eyster	
DA Yawar	
Gloria Kendrick	
Marian Habib	
Karen Melikian	

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Signature

[redacted]

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Signature

Karen L Stone

Terry L Stone

Sryn Griffin

Ronnie Griffin

B Norwell

Marie Robinson

Bob Lindemann

Sam Lindemann

Litsa Acedo

Jan Jakovich

[redacted]

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Cc: Debbie Nard: [redacted]

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Signature	Address
[illegible]	[redacted]
[illegible]	
Howard M. Ford	
Duane Eggebraaten	
Rang Eggebraaten	
Linda Solomon	
Patti Baker	
Bill Hinton	
A Hinton	
Jade Beal	

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Cc: Debbie Nard: [redacted]

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	[redacted]

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GARY H. RUSHING

Signature

Gary H Rushing [redacted]

Sara E. Rushing

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Cc: Debbie Nard: [redacted]

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Signature	Address
[illegible]	[redacted]
Carol Holmes	
Ian Holmer	
Kelly Rockhyall	

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Cc: Debbie Nard: [redacted]

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Signature	Address
DEELLA A. RAY	[redacted]

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Signature	Address
Carla Rattey	[redacted]
Robyn Wagner	
Thingdy Madsen	
Erik M	
[illegible]	
Marty A Dekenezo Bad	
Carrie McCreer	
[illegible] Kay	
Gina Kazarjian	

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Signature	[redacted]
[illegible]	
Eric Orozco	
Gwenith Cason	
[illegible]	
Carlton Rivers	
Judith Reeves	
STEVEN D. FLORES	
ANNETTE FLORES	
Lorraine McBride	
Carri Mayer	

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Signature	Address
Lisa A. Peacock (Lisa Peacock)	[redacted]
Jonah Peacock	
Haley Peacock	
Jordan Stacks	
Cedric Peacock	
McKenzie	
Andrew Peterson	

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

FENNEMORE.
DOWLING AARON

Christopher A. Brown
Director
cbrown@fennemorelaw.com

8080 N Palm Avenue, Third Floor
Fresno, California 93711
PH (559) 446-3222 | FX (559) 432-4590
fennemorelaw.com

January 14, 2024

VIA EMAIL AND CERTIFIED MAIL/ adrienne.asadoorian@fresno.gov

Adrienne Asadoorian-Gilbert
City of Fresno
2600 Fresno Street
Fresno, CA 93721

Re: **Public Comment on Project Application P24-00794 Development Code Text Amendment and the corresponding Mitigated Negative Declaration.**

Dear Ms. Asadoorian-Gilbert:

On behalf of the Northwest Neighbors for Safe Development, we submit this comment letter in opposition to the City Development Code Text Amendment Project Application P24-00794 and the corresponding Mitigated Negative Declaration, ("**Project**").

The Northwest Neighbors for Safe Development oppose this Development Code Text Amendment because it would make certain projects in the City of Fresno ministerial and thereby exempt from CEQA despite the fact that projects of certain sizes as contemplated in the MND having significant unmitigated impacts on the environment and public health.

On November 20, 2024, the City of Fresno ("**City**") circulated the Project's Mitigation Negative Declaration ("**MND**") for public comment through submission to the State Clearing House.[1] The reasons for the opposition are set forth herein.

The Northwest Neighbors for Safe Development earlier in 2024 opposed Fresno City Council July 25, 2024 Agenda Item ID 24-899: Appeal of Project at 7056 North Prospect Avenue, Development Permit Application No. P21-00989, and CEQA determination under Class 32 Categorical Exemption ("**7065 North Prospect Project**"). While the City Council denied that

[1] Initial Study/Mitigated Negative Declaration (IS/MND) on behalf of the City of Fresno (City) to address the environmental effects of the Development Code Text Amendment Application No. P24-00794 (Project, proposed Project, or Text Amendment) available at Text-Amendment-P24-00794-Public-Review-Draft-ISMND-10w300.pdf

Project, this 7056 North Prospect Avenue Project, was to be located on the northeast corner of West Herndon and North Prospect Avenues in Fresno. Under the proposed Development Code Text Amendment (which includes the northeast corner of West Herndon and North Prospect Avenues) projects of similar size to the 7056 North Prospect Project would not be required to undergo any CEQA analysis, despite the fact that Northwest Neighbors for Safe Development submitted substantial evidence to the City that projects of that size at that location would cause significant impacts on the environment and public health.

The City now attempts to avoid CEQA for projects of this size throughout the City by making them ministerial.

Our opposition previously was supported by technical comments provided by air quality and hazards expert James Clark, Ph.D,[2] and noise expert Derek Watry[3] submitted in conjunction with the 7056 North Prospect Project. They are attached here to provide substantial evidence that the Development Code Text Amendment is making projects of a similar size, which cause significant impacts, ministerial and thereby avoiding CEQA. Additionally, the MND lacks proper mitigation to avoid these impacts.

Approval of this Development Code Text would allow the 7056 North Prospect Project to be submitted again without any changes, and the City would be required to approve the project ministerially despite substantial evidence that these types of projects have unmitigated environmental impacts.

Specifically, the Development Code Text does not address potential project construction emissions, which may result in emissions of toxic air contaminants (“**TACs**”) that would increase health risks to significant levels. Additionally, construction includes noise-generating activities that may result in significant noise impacts on nearby receptors. These impacts are especially severe due to the proximity of residential receptors to certain sites which now would permit ministerial residential development.

As a result, an EIR is the correct form of environmental review for the Project, because the MND failed to: (1) properly analyze certain impacts like TACs and construction noise, in addition to (2) not properly mitigating impacts that are likely to occur given the size of projects which will be ministerial under the Development Code Text Amendment.

Northwest Neighbors for Safe Development respectfully requests that the Planning Commission require the Project to undergo an EIR or recirculate the MND after adding inappropriate levels of mitigation to reduce impact levels to insignificant.

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[2] Dr. Clark’s technical comments and curriculum vitae are attached hereto as **Exhibit A** (“Clark Comments”).
[3] Mr. Watry’s technical comments and curriculum vitae are attached hereto as **Exhibit B** (“Watry Comments”).

I. STANDING AND STATEMENT OF INTEREST

Northwest Neighbors for Safe Development is an unincorporated association of individuals that may be adversely affected by the potential public health and safety hazards, and the environmental and public service impacts of the Project. The coalition includes City of Fresno residents Matt Nutting, Brandon Smittcamp, Kirk Cernigli, J.T. Contrestano, Pat Cornaggia, Rodney J. De Luca, Gary H. Rushing, Peter Nunez, David Scott, Mike Shirinian, Vicki Allen-Westburg, Debbie Nard, Dennis Nard, Rick Martin, along with their families, and other individuals who live and work in the City of Fresno.

Individual members of Northwest Neighbors for Safe Development live, work, recreate, and raise their families in the City of Fresno and surrounding communities. Accordingly, they would be directly affected by the Project's environmental, health, and safety impacts.

Northwest Neighbors for Safe Development and its members could be aggrieved by the Project allowing ministerial residential development, without proper mitigation of environmental impacts those projects could create.

II. AN EIR IS REQUIRED

CEQA requires that lead agencies analyze any project with potentially significant environmental impacts in an EIR.[4] "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR protects not only the environment, but also informed self-government."[5] The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return."[6]

CEQA's purpose and goals must be met through the preparation of an EIR, except in certain limited circumstances.[7] CEQA contains a strong presumption in favor of requiring a lead agency to prepare an EIR. This presumption is reflected in the "fair argument" standard. Under that standard, a lead agency "shall" prepare an EIR whenever substantial evidence in the whole record before the agency supports a fair argument that a project may have a significant effect on the environment.[8]

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[4] See Pub. Resources Code, § 21000; CEQA Guidelines, § 15002.
[5] *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564 (*Goletta Valley*), internal citations omitted.
[6] *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.
[7] See Pub. Resources Code, § 21100.
[8] Pub. Resources Code, §§ 21080, subd. (d), 21082.2, subd. (d); CEQA Guidelines, §§ 15002, subd. (k)(3), 15064, subds. (f)(1), (h)(1); *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123 (*Laurel Heights II*); *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d

In contrast, a mitigated negative declaration may be prepared only when, after preparing an initial study, a lead agency determines that a project may have a significant effect on the environment, but:

> (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review *would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence* in light of the whole record before the public agency that the project, as revised, *may* have a significant effect on the environment.[9]

Courts have held that if "no EIR has been prepared for a nonexempt project, but substantial evidence in the record supports a fair argument that the project may result in significant adverse impacts, the proper remedy is to order preparation of an EIR."[10] The fair argument standard creates a "low threshold" favoring environmental review through an EIR rather than through the issuance of a negative declaration.[11] An agency's decision not to require an EIR can be upheld only when there is no credible evidence to the contrary.[12]

"Substantial evidence" required to support a fair argument is defined as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached."[13] According to the CEQA Guidelines, when determining whether an EIR is required, the lead agency is required to apply the principles set forth in Section 15064, subdivision (f):

> [I]n marginal cases where it is not clear whether there is substantial evidence that a project may have a significant effect on the environment, the lead agency shall be guided by the following principle: If there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the

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68, 75, 82; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150-151*; Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1601-1602 (*Quail Botanical*).

[9] Pub. Resources Code, § 21064.5 (emphasis added).

[10] See, e.g., *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 319-320.

[11] *Citizens Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754.

[12] *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th, 1307, 1318; see also *Friends of B Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1002 (*Friends of B Street*) ("If there was substantial evidence that the proposed project might have a significant environmental impact, evidence to the contrary is not sufficient to support a decision to dispense with preparation of an EIR and adopt a negative declaration, because it could be 'fairly argued' that the project might have a significant environmental impact").

13 CEQA Guidelines, § 15384, subd. (a).

> Lead Agency shall treat the effect as significant and shall prepare an EIR.

Furthermore, CEQA documents, including EIRs and MNDs, must mitigate significant impacts through measures that are "fully enforceable through permit conditions, agreements, or other legally binding instruments."[14] Deferring formulation of mitigation measures to post-approval studies is generally impermissible.[15] Mitigation measures adopted after project approval deny the public the opportunity to comment on the project as modified to mitigate impacts.[16] If identification of specific mitigation measures is impractical until a later stage in the project, specific performance criteria must be articulated and further approvals must be made contingent upon meeting these performance criteria.[17] Courts have held that simply requiring a project applicant to obtain a future report and then comply with the report's recommendations is insufficient to meet the standard for properly deferred mitigation.[18]

With respect to this Project, the MND fails to satisfy the basic purposes of CEQA. The MND fails to adequately disclose, investigate, and analyze the Project's potentially significant impacts, and fails to provide substantial evidence to conclude that impacts will be mitigated to a less than significant level. Because the MND lacks basic information regarding the Project's potentially significant impacts, the MND's conclusion that the Project will have a less than significant impact on the environment is unsupported.[19] The City failed to gather the relevant data to support its finding of no significant impacts. Moreover, substantial evidence shows that the Project may result in potentially significant impacts. Therefore, a fair argument can be made that the Project may cause significant impacts requiring the preparation of an EIR.

III. THE DEVELOPMENT CODE TEXT AMENDMENT WOULD ALLOW PROJECTS OF A SIZE THAT MAY CREATE SIGNIFICANT IMPACTS BY COMPARING THOSE MINISTERIAL PROJECTS AGAINST IDENTIFIED IMPACTS OF THE DENIED 7056 NORTH PROSPECT PROJECT

One primary purpose of the Development Code Text Amendment is to allow ministerial approval regarding certain types of residential developments. For projects of certain sizes, certain expected impacts, etc., such projects can be permitted ministerially. This letter provides substantial evidence that supports a fair argument of significant impacts by comparing characteristics of the

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[14] CEQA Guidelines, § 15126.4, subd. (a)(2).
[15] *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 308-309; Pub. Resources Code, § 21061.
[16] *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1393; *Quail Botanical*, supra, 29 Cal.App.4th at p. 1604, fn. 5
[17] *Id.*
[18] *Id.*
[19] Pub. Resources Code, § 21064.5.

denied 7056 North Prospect Project to projects that would now be allowed ministerially under the Development Code Text Amendments.

The 7056 North Prospect Project contained the following characteristics. It was located on approximately 3.7 acres located at 7056 North Prospect Avenue. The applicant proposed to construct an 82-unit multi-family residential development located at the northeast corner of West Herndon and North Prospect Avenues. The project proposed on-site and off-site improvements including, but not limited to, three (3) three-story multifamily residential buildings and one (1) four-story multifamily residential building consisting of 74 two-bedroom/two bathroom dwelling units and eight (8) two-bedroom/one-bathroom dwelling units, one (1) approximately 1,907 square-foot one-story community center building, one (1) swimming pool area, one (1) dog park area, 154 parking spaces (27 single-car garages, 72 covered carport parking spaces, and 55 uncovered parking spaces), and 6 long-term bicycle parking spaces. A Class 1 Trail for bicycle and pedestrian pathway exists along the Herndon Avenue property frontage and would serve the prospective residents. Direct access to the development would only be provided from North Prospect Avenue via a private gated entrance. One (1) emergency vehicle access approach was proposed along West Fir Avenue. Three (3) private pedestrian gates were to be provided along West Fir Avenue and two (2) private pedestrian gates were to be provided along North Prospect Avenue. The property is zoned RM-2/EA/UGM/cz (Residential Multi-Family, Urban Neighborhood/Expressway Overlay/Urban Growth Management/conditions of zoning).

Because site-specific analysis has been performed on the 7056 North Prospect Project, it provides a useful benchmark for potential impact projects that could be submitted under the proposed Development Code Text Amendment.

IV. THERE IS A FAIR ARGUMENT THAT THE PROJECT MAY RESULT IN SIGNIFICANT IMPACTS THAT REQUIRE THE CITY TO PREPARE AN EIR

Under CEQA, a lead agency must prepare an EIR whenever substantial evidence in the whole record before the agency supports a fair argument that a project may have a significant effect on the environment.[20] The fair argument standard creates a "low threshold" favoring environmental review through an EIR, rather than through issuance of a negative declaration.[21] An agency's decision not to require an EIR can be upheld only when there is no credible evidence to the contrary.[22] Substantial evidence can be provided by technical experts or members

[20] Pub. Resources Code, § 21082.2; CEQA Guidelines, § 15064, subds. (f), (h); *Laurel Heights II*, supra, 6 Cal. 4th at p. 1123; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal. 3d 68, 75, 82; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150-151; *Quail Botanical*, supra, 29 Cal.App.4th at pp. 1601-1602.
[21] *Citizens Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754.
[22] *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th, 1307, 1318; see also *Friends of B Street*, supra, 106 Cal.App.3d at p. 1002 ("If there was substantial evidence that the proposed project might have a significant environmental impact, evidence to the contrary is not sufficient to support a decision to dispense with preparation of an [environmental impact report] and adopt a negative declaration,

of the public.[23] "If a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect."[24]

As discussed below, there is a fair argument supported by substantial evidence that the Project may result in significant impacts relating to air quality, noise, and transportation. The City is required to prepare an EIR to evaluate the Project's impacts and propose mitigation measures to reduce those impacts to a less-than-significant level.

A. **There is Substantial Evidence Supporting a Fair Argument that the MND Underestimates and Fails to Properly Mitigate Air Quality Impacts**

There is substantial evidence supporting a fair argument that the City failed to analyze the health risk impacts of potential project construction and operation on nearby sensitive receptors, which could occur under future projects that would now be ministerial.

1. The MND Threshold for Unit and Floor Counts To Screen Out of Air Quality Analysis Is Far Above the Level Where Smaller Projects have Found Air Quality Impacts

First, the MND notes projects up to the following size will be ministerial, and once they exceed the following sizes the project will be discretionary and be required to perform some environmental review:

> If the Project would exceed 224 units for low-rise (1-2 levels), 225 units for mid-rise (3-10 levels), or 340 units for high-rise (10+ levels) apartments, and generate more than 800 average daily one-way trips [ministerial approval is not permitted]. If the project exceeds this threshold but a technical assessment for operational and construction emissions determines the project will be below applicable air district thresholds, then the project can be processed as a zone clearance.[25]

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because it could be 'fairly argued' that the project might have a significant environmental impact").

[23] See, e.g., *Citizens for Responsible and Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1340 (substantial evidence regarding noise impacts included public comments at hearings that selected air conditioners are very noisy); see also *Architectural Heritage Assn. v. County of Monterey*, 122 Cal.App.4th 1095, 1117-1118 (substantial evidence regarding impacts to historic resource included fact-based testimony of qualified speakers at the public hearing); *Gabric v. City of Rancho Palos Verdes* (1977) 73 Cal.App.3d 183, 199.

[24] CEQA Guidelines, § 15062, subd. (f).

[25] MND pg. 54.

For context, the 7056 North Prospect Project was 88 units at 4 levels. Any project under the above standard could have significantly more units and significantly more floors than the 7056 North Prospect Project without any level of environmental review.

While it is true that more units and floors do not inherently mean environmental impacts at levels that are significant, Dr. Clark presented substantial evidence there will be significant effects on public health in the 7056 North Prospect Project.

The 7056 North Prospect Project would have increased health risks in the surrounding community by contributing TACs such as Diesel Particulate Matter ("**DPM**") during construction.[26] During the 7056 North Prospect Project's construction, heavy equipment and diesel trucks would emit DPM. DPM has been linked to a range of serious health problems including an increase in respiratory disease, lung damage, cancer, and premature death.[27] The 7056 North Prospect Project's emissions of DPM would impact numerous sensitive receptors, including residents in residential buildings located within 25 feet of the 7056 North Prospect Project site.[28]

CEQA requires an analysis of human health impacts. CEQA Guidelines Section 15065(a)(4) provides that the City is required to find a project will have a significant impact on the environment and require an EIR if the environmental effects of a project will cause a substantial adverse effect on human beings.[29] The Supreme Court has also explained that CEQA requires the lead agency to disclose the health consequences that result from exposure to a project's air emissions.[30]

For development projects like 7056 North Prospect Project, and ministerial ones under the Project, the Office of Environmental Health Hazard Assessment's ("**OEHHA**") risk assessment guidelines recommend a formal health risk analysis ("**HRA**") for short-term construction exposures to TACs lasting longer than 2 months and exposures from projects lasting more than 6 months should be evaluated for the duration of the project.[31] In an HRA, lead agencies must first quantify the concentration released into the environment at each of the sensitive receptor locations through air dispersion modeling, calculate the dose of each TAC at that location, and quantify the

[26] Clark Comments, pg. 5.
[27] Clark Comments, pg. 6.
[28] Clark Comments, pg. 9.
[29] 14 CCR § 15065(a)(4); PRC § 21083(b)(3), (d).
[30] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516, 523.
[31] Office of Environmental Health Hazard Assessment (OEHHA), Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, February 2015 (OEHHA 2015), Section 8.2.10: Cancer Risk Evaluation of Short Term Projects, pp. 8-17/18; https://oehha.ca.gov/air/crnr/notice adoption air toxics hot spots program guidance manual preparation-health-risk-0

cancer risk and hazard index for each of the chemicals of concern.[32] Following that analysis, then the City can make a determination of the relative significance of the emissions.

The City did not conduct this analysis. Here, the MND concludes that the Project would not result in significant health risk impacts without conducting any of the above analytical steps. The City fails to disclose or analyze that the actual construction of residential units as described in the Project construction and operation would result in emissions of TACs. For example, the MND's analysis regarding TACs only focuses on not siting residential units near certain uses[33] The City fails to analyze that construction from 4,868 units could, in and of itself, result in TACs from construction.[34] Next, the City fails to disclose or analyze the health impacts of exposure to certain concentrations of TACs. Then the City fails to quantify the magnitude of TACs emitted by the Project. Lastly, the City fails to model the concentrations of TACs at sensitive receptors.[35] In sum, there is no evidence that the City considered health risks from TACs due to the construction of residential units themselves when determining that the Project's ministerial developments would not result in significant impacts on air quality and public health.

2. <u>The City's Significance Standards Rely on the Small Project Analysis Level to Screen Out Projects Based On Size, But The MND Does Not Then Require Projects to Perform Site Specific Analysis Despite the San Joaquin Valley Air Pollution Control District Requiring It for TACs and Sensitive Receptors</u>

The City reasons that because of the scale and scope of the residential units under the Project, if the residential projects qualify under the Small Project Analysis Level ("**SPAL**"), there would be no contributions to air quality impacts.[36] The SPAL specifically notes that the significance standards for dwelling units and trip counts are to quantify significance standards for "criteria pollutant emissions for CEQA purposes."[37] It does not address significance standards for TACs.

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[32] *Id.*
[33] MND pgs. 58-59.
[34] *Id.*; MND pg. 53.
[35] The City's failure to analyze the magnitude and concentration of the Project's TACs also conflicts with the OEHHA recommendations for HRAs. The OEHHA guidelines recommend an HRA be prepared for this Project's construction and operation because its 24-month construction schedule exceeds 2 months, and its operations would last over 6 months.
[36] MND, pg. 54.
[37] SJVAPCD. (2015). Air Quality Thresholds of Significance-Criteria Pollutants. Accessed on December 27, 2024, https://ww2.valleyair.org/media/m2ecyxiw/1-cms-format-ceqa-air-quality-thresholds-of-significance-criteria-pollutants.pdf

When reviewing the Guidance for Assessing and Mitigating Air Quality Impacts ("**GAMAQI**") put forth by the San Joaquin Valley Air Pollution Control District ("**SJVAPCD**").[38] This guidance notes that:

> When a project falls under the SPAL, the Lead Agency should use the information in the initial study checklist, or whatever format used, to justify a finding of less than significant air quality impacts. **The initial study should also verify that no sensitive receptors would be exposed to substantial pollutant concentrations as a result of the project**. Project size, as identified in the SPAL, is not a threshold of significance. SPAL is a screening tool. **The Lead Agency has the responsibility to identify and avoid potential land use conflicts, such as potential exposure of sensitive receptors to sources of toxic air contaminants**, sources of hazardous materials, and potential odors. (emphasis added).[39]

While the SPAL has since 2015 been adopted as a significance standard for criteria pollutants, it has not been adopted for TACs. The City clearly ignored the guidance's recommendations on TACs, and therefore, its conclusions are not supported by substantial evidence and do not mitigate the specific adverse impacts identified below. As SJVAPCD notes, just because a project qualifies as a SPAL, does not mean the project will have no environmental impacts. GAMAQI notes that the Lead Agency is responsible for identifying and avoiding potential exposure of TACs to sensitive receptors. Here, the MND analyzes TACs, but only so far as where to site residential units, not whether the construction of those units can create TACs themselves. Therefore, the City failed to analyze health risk impacts from exposure to TACs during the Project's expected construction of residential units and thus failed to support its finding of a less-than-significant health risk impact.

3. <u>The Project has Potentially Significant Health Risk Impacts from Projects Which Will Now Be Ministerial</u>

Dr. Clark calculated that the 7056 North Prospect Project's emissions of DPM would exceed applicable significance thresholds for health risks set by the SJVAPCD.

Using OEHHA's HARP 2 Standalone Risk software, Dr. Clark calculated the cancer risk to the most sensitive population – infants less than 3 years old.[40] The maximum risk for exposure during construction is 21.5 in 1,000,000, which is greater than the 20 in 1,000,000 threshold set

[38] *Id* at p. 6.
[39] Guidance for Assessing and Mitigating Air Quality Impacts, San Joaquin Valley Air Pollution Control District, p. 86, available at https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF#page=86
[40] Clark Comments, pg. 10.

forth by the SJVAPCD for the maximally exposed individual. Dr. Clark's modeling even shows which receptors will be subject to these potentially significant impacts.[41]

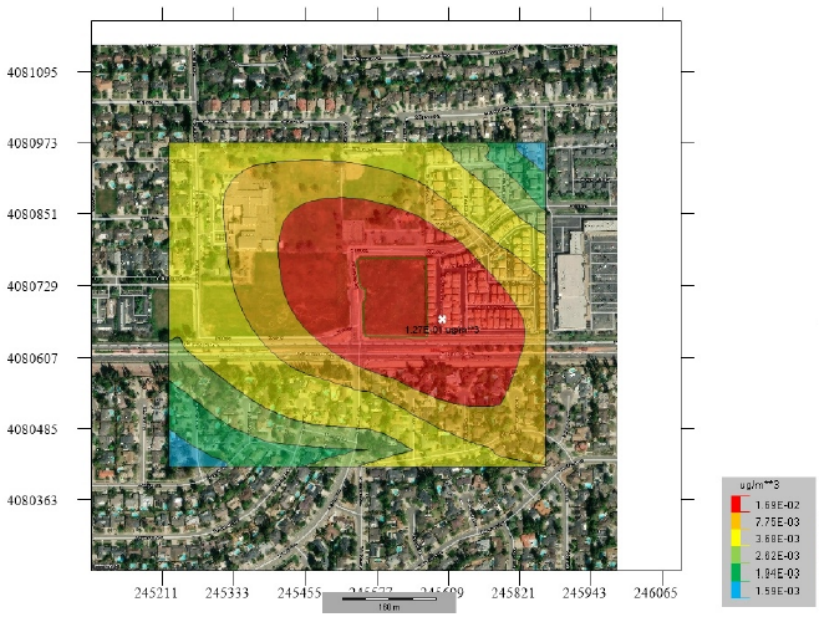

Figure 6: Model output showing DPM concentrations from 2024 through 2025

As a result of these significant effects, the 7056 North Prospect Project did not qualify for any CEQA exemption, including a Class 32 exemption. Here, the Project would allow projects the same size as the 7056 North Prospect Project ***and up to 2.5 times larger to not undergo any site-specific analysis***. Thus, it is fair to conclude those projects also could create significant impacts that must be disclosed and mitigated in an EIR.

B. <u>There is Substantial Evidence Supporting a Fair Argument that the MND Underestimates and Fails to Properly Mitigate Noise Impacts</u>

1. <u>The City Lacks Substantial Evidence to Conclude That the Project's Noise Impacts From Construction are Less Than Significant</u>

The MND states that the Project would result in less-than-significant construction noise impacts, because "[i]t is not anticipated that future residential development would generate substantial temporary or permanent increase in existing ambient noise levels within the Project Area in excess of standards established in the General Plan or FMC, or in other applicable local, state, or federal standards."[42] This is the extent of the City's analysis regarding construction impacts and the basis for its significance determination. The City fails to provide why it believes

[41] *Id*.
[42] MND, pg. 139.

construction impacts are not anticipated, what assumptions that belief is based upon, or a supporting factual basis for this conclusion.

Courts have held that compliance with noise regulations alone is not substantial evidence of a less-than-significant impact.[43] In *Oro Fino Gold Mining Corp. v. County of El Dorado* ("*Oro Fino*"),[44] a mining company applied for a special use permit for drilling holes to explore for minerals.[45] The mining company argued the proposed mitigated negative declaration prohibited noise levels above the applicable county general plan noise standard maximum of 50 dBA and, therefore, there could be no significant noise impact. The court rejected this argument: "we note that conformity with a general plan does not insulate a project from EIR review where it can be fairly argued that the project will generate significant environmental effects."[46] Thus, the court concluded an EIR was required.

In *Citizens for Responsible & Open Government v. City of Grand Terrace* ("*Grand Terrace*"),[47] the city approved a 120-unit senior housing facility based on a mitigated negative declaration.[48] The noise element of the city's general plan stated exterior noise levels in residential areas should be limited to 65 dB CNEL.[49] The initial study concluded the facility's air conditioner units would cause noise impacts, but with mitigating measures the project would operate within the general plan's noise standard. But the court cited *Oro Fino* for the principle that "'conformity with a general plan does not insulate a project from EIR review where it can be fairly argued that the project will generate significant environmental effects.'"[50] A citizen's group provided substantial evidence supporting such a fair argument. This evidence included testimony from an individual in the HVAC industry that the type of air conditioning units proposed by the project "sound like airplanes."[51] And at a city council public hearing, community and city council members expressed concern that the air conditioners would be noisy.[52] The court considered the testimony about the noise generated by the proposed air conditioners, took into account the mitigation measures, and concluded "there is substantial

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[43] *King & Gardiner Farms, LLC v. Cnty. of Kern* (2020) 45 Cal.App.5th 814, 865.
[44] (1990) 225 Cal.App.3d 872.
[45] *Id*. at pg. 876; *see also Keep our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714; *Citizens for Responsible & Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1338; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1416 (project's effects can be significant even if "they are not greater than those deemed acceptable in a general plan"); *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 354, ("CEQA nowhere calls for evaluation of the impacts of a proposed project on an existing general plan").
[46] *Id*. at pp. 881–882.
[47] (2008) 160 Cal.App.4th 1323.
[48] Id. at 1327.
[49] *Grand Terrace*, 160 Cal.App.4th at 1338.
[50] *Grand Terrace*, *supra*, at pg. 1338.
[51] *Id*. at 1338-1339.
[52] *Id*. at 1338.

evidence that it can be fairly argued that the Project may have a significant environmental noise impact."[53]

Here the City's conclusions regarding impacts from Construction Noise are not supported by substantial evidence because the City did not perform any analysis to reach said conclusions. Mr. Watry notes that it is possible for a project to cause significant environmental noise impacts regardless of whether the Fresno Municipal Code makes this type of noise a violation.[54] The City merely assumed that compliance with the City's noise ordinance means it is impossible for there to also be construction noise impacts. This conflation is wrong and violates CEQA.

2. The Project has Potentially Significant Construction Noise Impacts

To further demonstrate this, Mr. Watry performed a construction noise analysis for the 7056 North Prospect Project and found that construction noise would exceed the residential noise thresholds of 55 dB from 7:00 p.m. to 10:00 p.m. and 60 dB from 7 a.m. to 7 p.m.[55] Mr. Watry recited the City's noise ordinance which described what noise levels are usually prima facie noise violations:

> Any noise or sound exceeding the ambient noise level at the property line of any person offended thereby, or, if a condominium or apartment house, within any adjoining living unit, by more than five decibels shall be deemed to be prima facie evidence of a violation of Section 8-305.[56]

Mr. Watry used this value combined with a significant buffer of an additional 5 dBA to determine what level of noise impacts could constitute potentially significant noise impacts for the 7056 North Prospect Project.[57] Using the Environmental Protection Agency's values for Residential Construction Noise, Mr. Watry concluded that every phase of construction for the 7056 North Prospect Project would exceed the residential thresholds by at least 10 dBA significance threshold for residential. While every phase of construction will exceed 70 dBA, some will significantly exceed this based on the average EPA Noise Levels for each phase of construction:[58]

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[53] *Id*. at p. 1341.
[54] Watry Comments, p. 2.
[55] Watry Comments, p. 5.
[56] FMC sec. 10-106.
[57] Watry Comments, p. 4.
[58] Watry Comments, p. 3.

TABLE I EPA NOISE LEVELS FOR RESIDENTIAL CONSTRUCTION

Phase	Average	Range‡
Ground clearing	83 dBA	75 to 91 dBA
Excavation	88	80 to 96
Foundations	81	71 to 91
Erection	81	71 to 91
Finishing	88	81 to 95

As such the MND's conclusions regarding impacts from Construction Noise are not supported by substantial evidence because the City failed to analyze construction noise impacts or present substantial evidence that there will not be potentially significant construction noise impacts. Presumably, there will be many sites in the Project Area that have similar amounts of sensitive receptors as the 7056 North Prospect Project. This amount of proposed residential development means many current residents will face significant impacts that are not accounted for in this MND.

As a result of these significant effects, the Project's impacts on Noise are significant and not mitigated. The Project's significant impacts must be disclosed and mitigated in an EIR.

C. There is Substantial Evidence Supporting a Fair Argument that the MND Underestimates and Fails to Properly Mitigate Transportation Impacts

There is substantial evidence supporting a fair argument that the City failed to analyze transportation risk impacts of potential project construction and operation on nearby sensitive receptors, which could occur under future projects that would now be ministerial.

Here, the City also failed to review the Project's pedestrian and bicycle safety impacts, for Projects of less than 200 units. For instance, given 7056 North Prospect Project's density and proximity to the Tatarian Elementary School and Orchard Park, many existing neighbors, with eye-witness experience, and the Fresno Unified School District President Susan Wittrup commented on present traffic and pedestrian safety issues that would be exacerbated by the 7056 North Prospect Project.[59]

These comments were for a development that only envisioned 88 units, far below the City's now proposed 200-unit threshold which could occur without analyzing these issues. The City provides no basis or analysis on why 200 units is an appropriate threshold for providing no analysis on pedestrian and bicycle safety impacts. As such the City's conclusions regarding

[59] Fresno City Council Agenda for July 25, 2024 Meeting Agenda Item ID 24-899, Exhibit O, pg. 8-9, available at ID 24-899 - Exhibit O - Correspondence Received (legistar.com).

Transportation impacts are not supported by substantial evidence and do not support the use of an exemption.

V. CONCLUSION

Northwest Neighbors for Safe Development respectfully requests that the Planning Commission require the Project to undergo an EIR or recirculate the MND after adding inappropriate levels of mitigation to reduce impact levels to insignificant.

Sincerely,

FENNEMORE DOWLING AARON

Christopher A. Brown

CBRO/mrh
Attachments
cc: Andrew Janz (Andrew.Janz@fresno.gov)

EXHIBIT A

Clark & Associates
Environmental Consulting, Inc.

OFFICE
12405 Venice Blvd
Suite 331
Los Angeles, CA 90066

PHONE
310-907-6165

FAX
310-398-7626

EMAIL
jclark.assoc@gmail.com

July 19, 2024

Fennemore Law
1111 Broadway, 24th Floor
Oakland, CA 94607

Attn: Mr. Chris Brown

Subject: Comment Letter on Categorical Exemption For The 7056 North Prospect Avenue Project Categorical Exemption (CE) From The City Of Fresno, California

Dear Mr. Brown:

At the request of Fennemore Law (FL), Clark and Associates (Clark) has reviewed materials related to the February 9, 204 Categorical Exemption (CE) from the City of Fresno (the City) of the above referenced project. The Class 32 CE is proposed for the Project without consideration of the substantial air quality impacts that will be placed on the surrounding neighborhood. The project involves the construction of an 82-unit private gated multi-family development immediately adjacent to existing single-family residential neighborhood located east of the Project Site.

Clark's review of the materials in no way constitutes a validation of the conclusions or materials contained within the CE. If we do not comment on a specific item, this does not constitute acceptance of the item.

The project proposes on-site and off-site improvements including, but not limited to, three (3) three-story multifamily residential buildings and one (1) four-story building multifamily residential building consisting of 74 two-bedroom/two bathroom dwelling units and eight (8) two-bedroom/one bathroom dwelling units, one (1) approximately 1,907 square-foot one-story community center building, one (1) swimming pool area, one (1) dog park area, 154 parking spaces (27 single-car garages, 72 covered carport parking spaces, and 55 uncovered parking

spaces), and 6 long-term bicycle parking spaces. Direct access to the development will only be provided from North Prospect Avenue via a private gated entrance. One (1) emergency vehicle access approach is proposed along West Fir Avenue. Three (3) private pedestrian gates will be provided along West Fir Avenue and two (2) private pedestrian gates will be provided along North Prospect Avenue.

Existing Conditions

The Project Site is currently vacant and undeveloped. The proposed project is located within City limits, occurs on a vacant site of approximately 3.7 acres, which is less than the five-acre maximum, and is surrounded by other urban uses. An existing single-family residential neighborhood is located east of the project site. The property to the west is currently vacant and planned and zoned for Employment – Offices uses. The property to the north has been developed with a neighborhood park (Orchid Park). Properties further to the northwest and northeast have been developed with an elementary school (H. Roger Tatarian Elementary School) and single-family residential neighborhoods.

Figure 1: Project Site Location

General Comments:

No attempt has been made to quantify the emissions from the construction and operational phases of the Project. The City argues that using the project type, size, and number of vehicle trips, the San Joaquin Valley Air Pollution Control District (SJV-APCD) has prequantified emissions and determined values below which it is reasonable to conclude that a project would not exceed applicable thresholds of significance for criteria pollutants. The goes on to state that according to the Small Project Analysis Level (SPAL) Table 1 Residential, Apartment, Mid- Rise with a size of 225 dwelling units and 800 or less average daily one-way trips for all fleet types of 800 or less are deemed to be less than significant. Using the ITE Trip Generation Rates 11th Edition, the subject project (82-unit apartments) would generate 461 average daily trips (two-way trips). Thus, it is less than the SPAL 800 average daily one-way trip threshold. The project as described will not occur at a scale or scope with potential to contribute substantially or cumulatively to existing or projected air quality violations or impacts. This analysis fails to consider the impacts from construction activities at the Project Site and the release of toxic air contaminants (TACs), primarily in the form of diesel particulate matter (DPM) from the construction equipment, onto the adjacent homes. The City's failure to analyze for the health risks associated with the Project ignores the potentially significant impacts which must be analyzed in an environmental impact report (EIR).

Specific Comments:

1. **The City Failed To Perform An Air Quality Analysis Of The Project's Construction And Operational Phases.**

Using the current version of the CalEEMOD (Version 2020.4.0) software I have calculated the unmitigated emissions from the construction phase and operational of the Project. The results are attached as Exhibit A to this letter. Using the data contained in the project description and attached drawings (available from the City's website). The modeled Project is outlined in the figure below.

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments Mid Rise	82.0	Dwelling Unit	3.70	54,293	64,835	—	262	—
Parking Lot	40.6	1000sqft	0.93	0.00	—	—	—	—

Figure 2: Project Description For CalEEMOD Analysis

Using the default settings from CalEEMOD, a Project construction schedule was derived. The schedule included 5 distinct phases of work including site preparation, grading, building construction, paving of parking, and application of architectural coatings. Each phase was assumed to be distinct and no overlapping of emissions was assumed.

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	8/30/2024	9/6/2024	5.00	5.00	—
Grading	Grading	9/7/2024	9/18/2024	5.00	8.00	—
Building Construction	Building Construction	9/19/2024	8/7/2025	5.00	230	—
Paving	Paving	8/8/2025	9/2/2025	5.00	18.0	—
Architectural Coating	Architectural Coating	9/3/2025	9/28/2025	5.00	18.0	—

Figure 3: Default Construction Schedule

The CalEEMOD model allows users to select the types of construction equipment available for each phase, hours of operation, along with the emission controls that may be in place. The modeled construction equipment was assumed to be the averaged value of the fleet available currently.

The CalEEMOD analysis generates daily and annual emission values of total organic gases (TOGs), reactive organic gases (ROGs), oxides of nitrogen (NO_x), carbon dioxide (CO), sulfur dioxide (SO2), particulate matter less than ten microns as exhaust (PM_{10E}), particulate matter less than ten microns as dust (PM_{10D}), total PM_{10}, particulate matter less than 2.5 microns as exhaust ($PM_{2.5E}$), particulate matter less than 2.5 microns as dust ($PM2_{2.5D}$), total $PM_{2.5}$, and greenhouse gases. Based on the CalEEMOD analysis, the Project would not exceed the regulatory thresholds for the criteria pollutants listed by SJV-APCD.

Pollutant/Precursor	Construction Emissions	Operational Emissions	
		Permitted Equipment and Activities	Non-Permitted Equipment and Activities
	Emissions (tpy)	Emissions (tpy)	Emissions (tpy)
CO	100	100	100
NOx	10	10	10
ROG	10	10	10
SOx	27	27	27
PM_{10}	15	15	15
PM2.5	15	15	15

Figure 4: SJV-APCD Significance Thresholds For Pollutants

The results of the model's output of PM_{10E} though was used in the next part of my analysis to determine if the emissions would exceed the SJV-APCD's risk threshold (a cancer risk of 20 in 1,000,000).

2. Diesel Exhaust From Construction Equipment Is Toxic And Must Be Evaluated Quantitatively To Determine The Health Impacts On The Nearest Sensitive Receptor(s)

Diesel exhaust, in particular DPM, is classified by the State of California as a TAC. TACs, including DPM[1], contribute to a host of respiratory impacts and may lead to the development of various cancers. Failing to quantify the carcinogenic and other health risk impacts places the community at risk for unwanted adverse health impacts. *Even brief exposures to the TACs could lead to the development of adverse health impacts over the life of an individual.*

Diesel exhaust contains nearly 40 toxic substances, including TACs, and may pose a serious public health risk for residents in the vicinity of the Project. TACs are airborne substances that are capable of causing short-term (acute) and/or long-term (chronic or carcinogenic, i.e., cancer causing) adverse human health effects (i.e., injury or illness). TACs include both organic and inorganic

[1] Because DPM is a TAC, it is a different air pollutant than criteria particulate matter (PM) emissions such as PM10, PM2.5, and fugitive dust. DPM exposure causes acute health effects that are different from the effects of exposure to PM alone.

chemical substances. The current California list of TACs includes approximately 200 compounds, including particulate emissions from diesel-fueled engines.

Diesel exhaust has been linked to a range of serious health problems including an increase in respiratory disease, lung damage, cancer, and premature death.[2,3,4] Fine DPM is deposited deep in the lungs in the smallest airways and can result in increased respiratory symptoms and disease; decreased lung function, particularly in children and individuals with asthma; alterations in lung tissue and respiratory tract defense mechanisms; and premature death.[5] Exposure to DPM increases the risk of lung cancer. It also causes non-cancer effects including chronic bronchitis, inflammation of lung tissue, thickening of the alveolar walls, immunological allergic reactions, and airway constriction.[6] DPM is a TAC that is recognized by state and federal agencies as causing severe health risk because it contains toxic materials, unlike $PM_{2.5}$ and PM_{10}.[7]

Nearby sensitive receptors would be exposed to TACs released during Project construction and operation, including DPM. The nearest sensitive receptors to the Project include the single-family residential neighborhood is located east of the Project Site, the elementary school to the west of the Project Site, and the remaining residences to the southwest and southeast of the Project Site.

The City must assess the air quality impacts for all TACs that will be released during the construction and operational phases of the project. CARB[8] defines diesel exhaust as a complex mixture

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[2] California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998; see also California Air Resources Board, Overview: Diesel Exhaust & Health, https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health#:~:text=Diesel%20Particulate%20Matter%20and%20Health&text=In%201998%2C%20CARB%20identified%20DPM,and%20other%20adverse%20health%20effects.

[3] U.S. EPA, Health Assessment Document for Diesel Engine Exhaust, Report EPA/600/8-90/057F, May 2002.

[4] Environmental Defense Fund, Cleaner Diesel Handbook, Bring Cleaner Fuel and Diesel Retrofits into Your Neighborhood, April 2005; http://www.edf.org/documents/4941_cleanerdieselhandbook.pdf, accessed July 5, 2020.

[5] California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998.

[6] Findings of the Scientific Review Panel on The Report on Diesel Exhaust as adopted at the Panel's April 22, 1998 Meeting.

[7] Health & Safety Code § 39655(a) (defining "toxic air contaminant" as air pollutants "which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal act (42 U.S.C. Sec. 7412 (b)) is a toxic air contaminant.")

[8] CARB. 1998. Report to the Air Resources Board on the Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Part A, Public Exposure To, Sources and Emissions of Diesel Exhaust In California. April 22, 1998. Pg A-1.

of inorganic and organic compounds that exists in gaseous, liquid, and solid phases. CARB and U.S. EPA identify 40 components of the exhaust as suspected human carcinogens, including formaldehyde, 1,3-butadiene, and benzo[a]pyrene. The inhalation unit risk factor identified by OEHHA for use in risk assessments is for the particulate matter (DPM) fraction of diesel exhaust and not the vapor phase components identified by CARB and U.S. EPA.

There is notable precedent requiring a quantitative analysis of TACs from diesel exhaust in CEQA documents. Moreover, the absence of this analysis renders the CE's Air Quality Analysis incomplete. For example, in a 2017 Notice of Preparation of a CEQA Document For the Los Robles Apartments Project, from the SCAQMD[9] noted that:

"In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysishandbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included." This is a common and feasible analysis that is routinely performed for development projects like the 7056 North Prospect Project.

No effort is made in the CE to quantify the potential health impacts from DPM generated by construction activities or operational activities from the Project on nearby receptors. The City's failure to perform such an analysis is clearly a major flaw in the CE and may be placing the nearby residents at risk from the construction and operational phases of the Project.

3. Using The Results Of The CalEEMOD Analysis I Have Constructed An Air Dispersion Model Of The Emissions And Calculated That The Health Risk From DPM Emissions Will Exceed The SJC-APCD's Risk Significance Threshold Of 20 In One Million.

Using the model described above, a total of 123.6 pounds of DPM were calculated to be emitted from the construction phase of the Project. The Project construction phase will last approximately 279

[9] SCAQMD. 2017. Comment Letter To David Sanchez, Senior Planner City of Pasadena from Jillian Wong, Planning and Rules Manager, SCAQMD.

work days and would last a total of 1.03 years (workdays plus holidays, plus weekends).

Phase	Year	Emissions	Duration	Total Emissions For Phase
		lbs/day	days	lbs
Site Preparation	2024	1.6	5	8
Grading	2024	0.84	8	6.72
Building Construction	2024	0.5	68	34
Building Construction	2025	0.43	162	69.66
Paving	2025	0.29	18	5.22
Architectural Coating	2025	0.03	18	0.54
Total			279	123.6

The construction site is assumed to be approximately 3.7 acres or approximately 1.61 E+05 square feet. Limiting the emissions to an 8-hour period during weekdays, the time weight averaged emission rate for 2024 through 2025 was calculated to be 3.46×10^{-7} lbs per hour of operation per square feet.

AERMOD is an acronym for the American Meteorological Society/Environmental Protection Agency Regulatory Model Improvement Committee's Dispersion Model. AERMOD contains the necessary algorithms to model air concentrations from a wide range of emission source types, including stack-based point sources, fugitive area sources, and volume sources. The modeling domain with the Project Site are indicated in the figure below. The green area is the source area of DPM from construction of the Project.

Figure 5: Model Domain And Receptors

Using the 5-year meteorological data from SJV-APCD for the Fresno Airport monitoring station (closest met station to the Project site), limiting the emissions to an 8-hour period on weekdays, the concentrations at the nearest receptors were calculated and are summarized below. The results are presented in Exhibit B to this letter.

Table 2: Annual Average DPM Concentrations Modeled For Construction Phase

2018	2019	2020	2021	2022
ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3
1.27E-01	1.09E-01	1.06E-01	1.21E-01	1.26E-01

Assuming that emissions will be limited to an eight-hour period during weekdays, it is possible to calculate an averaged emissions over the whole construction site. Using AERMOD, the US EPA's

preferred air dispersion model, it is possible to calculate the concentrations of DPM from the construction area at the closest receptors near the construction site.

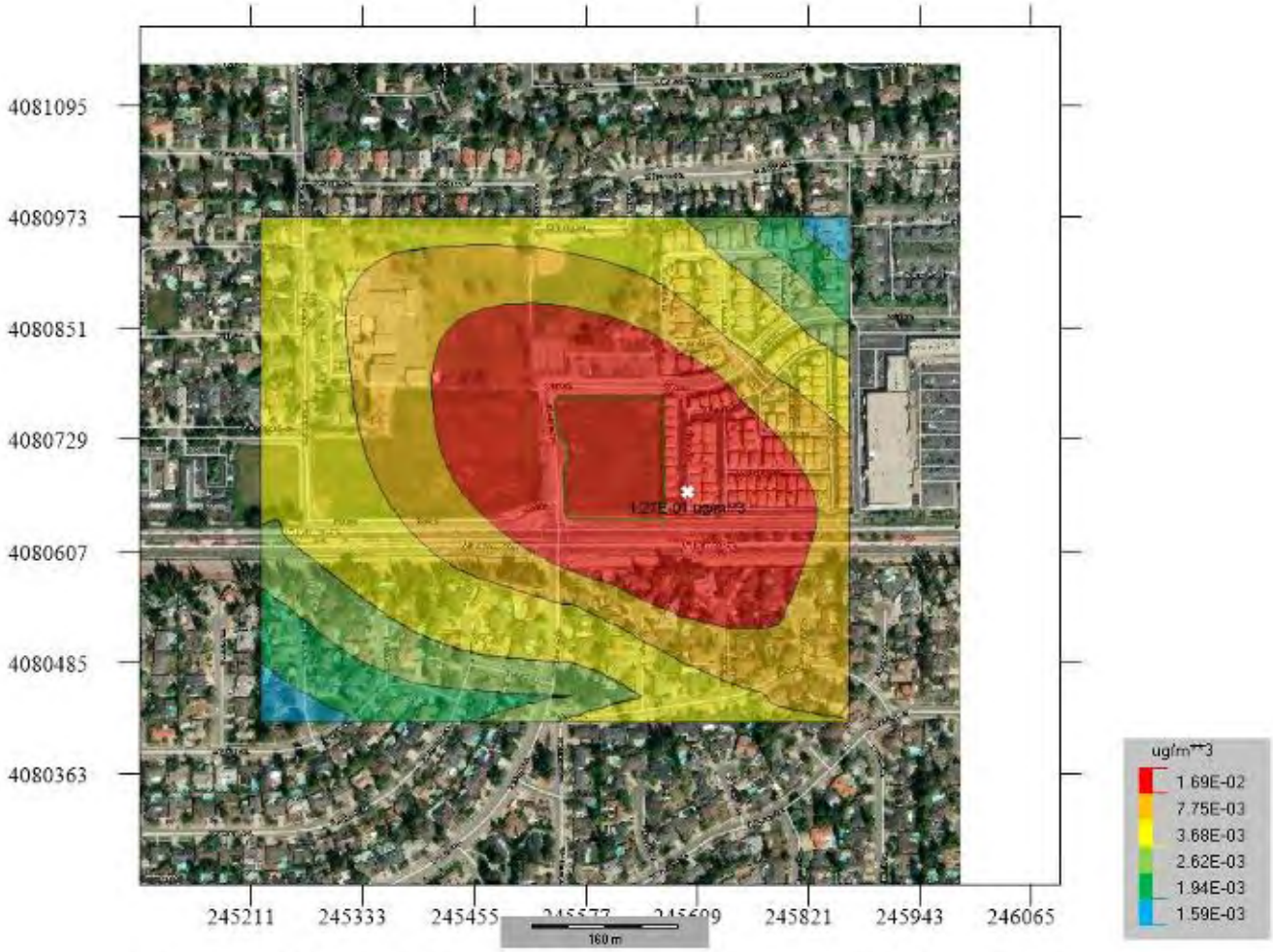

Figure 6: Model output showing DPM concentrations from 2024 through 2025

Based on the assumptions detailed above, the maximum averaged concentration of DPM from the construction phase of the project is 0.127 ug/m^3. The median value of the concentrations modeled at the same location is 0.121 ug/m^3.

Using the algorithms from OEHHA's HARP 2 Standalone Risk software, the cancer risk to the most sensitive population, infants less than 3 years old was calculated. The risk for exposure of infants during the 1 years of construction is 21.5 in 1,000,000 using the maximum concentration modeled, much greater than the 20 in 1,000,000 significance threshold outlined by SJV-APCD, resulting in a significant impact. The risk for exposure of infants during the 1 years of construction is

20.5 in 1,000,000 using the median concentration modeled, much greater than the 20 in 1,000,000 significance threshold outlined by SJV-APCD, resulting in a significant impact.

It is clear from the results above that the unmitigated emissions from the construction phase of the Project represent a significant risk if the CE were signed. The City must quantify and disclose these significant impacts in an EIR for the Project.

Conclusion

The facts identified and referenced in this comment letter lead me to reasonably conclude that the Project could result in significant impacts if allowed to proceed. The City must prepare an EIR to address these substantial concerns and to address the errors presented in the CE.

Sincerely,

Exhibit A

CalEEMOD Analysis

7056 North Prospect Ave Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	7056 North Prospect Ave
Construction Start Date	8/1/2024
Operational Year	2025
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	22.6
Location	36.83816901498409, -119.85291402629232
County	Fresno
City	Fresno
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2425
EDFZ	5
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.26

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments Mid Rise	82.0	Dwelling Unit	3.70	54,293	64,835	—	262	—

Parking Lot	40.6	1000sqft	0.93	0.00	—	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	19.7	19.7	36.0	33.6	0.05	1.60	19.8	21.4	1.47	10.1	11.6	—	5,404	5,404	0.22	0.05	1.76	5,424
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.70	1.44	11.6	15.1	0.02	0.50	0.35	0.85	0.46	0.08	0.54	—	2,840	2,840	0.12	0.05	0.05	2,858
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.71	1.60	4.99	6.94	0.01	0.20	0.50	0.64	0.19	0.23	0.36	—	1,300	1,300	0.05	0.02	0.32	1,308
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.31	0.29	0.91	1.27	< 0.005	0.04	0.09	0.12	0.03	0.04	0.07	—	215	215	0.01	< 0.005	0.05	217
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	10.0	10.0	100	27.0	—	—	15.0	—	—	15.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	4.42	3.73	36.0	33.6	0.05	1.60	19.8	21.4	1.47	10.1	11.6	—	5,404	5,404	0.22	0.05	1.76	5,424
2025	19.7	19.7	10.8	15.3	0.02	0.43	0.35	0.78	0.40	0.08	0.48	—	2,871	2,871	0.11	0.05	1.64	2,891
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	1.70	1.44	11.6	15.1	0.02	0.50	0.35	0.85	0.46	0.08	0.54	—	2,840	2,840	0.12	0.05	0.05	2,858
2025	1.60	1.35	10.8	14.9	0.02	0.43	0.35	0.78	0.40	0.08	0.48	—	2,831	2,831	0.11	0.05	0.04	2,849
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.46	0.39	3.25	3.97	0.01	0.14	0.50	0.64	0.13	0.23	0.36	—	721	721	0.03	0.01	0.16	725
2025	1.71	1.60	4.99	6.94	0.01	0.20	0.16	0.36	0.19	0.04	0.22	—	1,300	1,300	0.05	0.02	0.32	1,308
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.08	0.07	0.59	0.72	< 0.005	0.03	0.09	0.12	0.02	0.04	0.07	—	119	119	0.01	< 0.005	0.03	120
2025	0.31	0.29	0.91	1.27	< 0.005	0.04	0.03	0.07	0.03	0.01	0.04	—	215	215	0.01	< 0.005	0.05	217

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.81	5.53	2.88	34.8	0.09	2.76	1.91	4.67	2.66	0.48	3.14	485	4,249	4,733	6.23	0.15	9.40	4,943
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	7.16	4.89	3.03	29.0	0.09	2.76	1.91	4.67	2.66	0.48	3.14	485	4,033	4,518	6.25	0.16	0.62	4,722
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.06	3.44	2.13	16.1	0.04	0.67	1.79	2.46	0.64	0.45	1.10	139	3,313	3,452	4.60	0.15	4.09	3,615
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.74	0.63	0.39	2.93	0.01	0.12	0.33	0.45	0.12	0.08	0.20	23.0	549	572	0.76	0.02	0.68	598
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	10.0	10.0	100	27.0	—	—	15.0	—	—	15.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.84	1.74	1.34	11.1	0.02	0.02	1.91	1.93	0.02	0.48	0.50	—	2,458	2,458	0.12	0.13	9.01	2,507
Area	5.90	3.76	1.03	23.4	0.06	2.70	—	2.70	2.60	—	2.60	446	876	1,321	2.10	< 0.005	—	1,374
Energy	0.06	0.03	0.52	0.22	< 0.005	0.04	—	0.04	0.04	—	0.04	—	906	906	0.10	0.01	—	911
Water	—	—	—	—	—	—	—	—	—	—	—	6.33	8.74	15.1	0.65	0.02	—	36.0
Waste	—	—	—	—	—	—	—	—	—	—	—	32.6	0.00	32.6	3.26	0.00	—	114
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.39	0.39
Total	7.81	5.53	2.88	34.8	0.09	2.76	1.91	4.67	2.66	0.48	3.14	485	4,249	4,733	6.23	0.15	9.40	4,943
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.64	1.52	1.53	9.95	0.02	0.02	1.91	1.93	0.02	0.48	0.50	—	2,255	2,255	0.14	0.14	0.23	2,299

Area	5.46	3.34	0.98	18.8	0.06	2.70	—	2.70	2.60	—	2.60	446	863	1,309	2.10	< 0.005	—	1,362
Energy	0.06	0.03	0.52	0.22	< 0.005	0.04	—	0.04	0.04	—	0.04	—	906	906	0.10	0.01	—	911
Water	—	—	—	—	—	—	—	—	—	—	—	6.33	8.74	15.1	0.65	0.02	—	36.0
Waste	—	—	—	—	—	—	—	—	—	—	—	32.6	0.00	32.6	3.26	0.00	—	114
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.39	0.39
Total	7.16	4.89	3.03	29.0	0.09	2.76	1.91	4.67	2.66	0.48	3.14	485	4,033	4,518	6.25	0.16	0.62	4,722
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.58	1.48	1.36	9.32	0.02	0.02	1.79	1.81	0.02	0.45	0.47	—	2,198	2,198	0.12	0.12	3.70	2,241
Area	2.42	1.93	0.24	6.51	0.01	0.61	—	0.61	0.58	—	0.58	100	200	300	0.47	< 0.005	—	312
Energy	0.06	0.03	0.52	0.22	< 0.005	0.04	—	0.04	0.04	—	0.04	—	906	906	0.10	0.01	—	911
Water	—	—	—	—	—	—	—	—	—	—	—	6.33	8.74	15.1	0.65	0.02	—	36.0
Waste	—	—	—	—	—	—	—	—	—	—	—	32.6	0.00	32.6	3.26	0.00	—	114
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.39	0.39
Total	4.06	3.44	2.13	16.1	0.04	0.67	1.79	2.46	0.64	0.45	1.10	139	3,313	3,452	4.60	0.15	4.09	3,615
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.29	0.27	0.25	1.70	< 0.005	< 0.005	0.33	0.33	< 0.005	0.08	0.09	—	364	364	0.02	0.02	0.61	371
Area	0.44	0.35	0.04	1.19	< 0.005	0.11	—	0.11	0.11	—	0.11	16.6	33.1	49.7	0.08	< 0.005	—	51.7
Energy	0.01	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	—	150	150	0.02	< 0.005	—	151
Water	—	—	—	—	—	—	—	—	—	—	—	1.05	1.45	2.50	0.11	< 0.005	—	5.96
Waste	—	—	—	—	—	—	—	—	—	—	—	5.40	0.00	5.40	0.54	0.00	—	18.9
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	0.74	0.63	0.39	2.93	0.01	0.12	0.33	0.45	0.12	0.08	0.20	23.0	549	572	0.76	0.02	0.68	598

3. Construction Emissions Details

3.1. Site Preparation (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.34	3.65	36.0	32.9	0.05	1.60	—	1.60	1.47	—	1.47	—	5,296	5,296	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.49	0.45	< 0.005	0.02	—	0.02	0.02	—	0.02	—	72.5	72.5	< 0.005	< 0.005	—	72.8
Dust From Material Movement	—	—	—	—	—	—	0.27	0.27	—	0.14	0.14	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.09	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.0	12.0	< 0.005	< 0.005	—	12.1

Dust From Material Movement	—	—	—	—	—	—	0.05	0.05	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.04	0.71	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	108	108	0.01	< 0.005	0.43	110
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.36	1.36	< 0.005	< 0.005	< 0.005	1.39
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.23	0.23	< 0.005	< 0.005	< 0.005	0.23
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.26	1.90	18.2	18.8	0.03	0.84	—	0.84	0.77	—	0.77	—	2,958	2,958	0.12	0.02	—	2,969
Dust From Material Movement	—	—	—	—	—	—	7.08	7.08	—	3.42	3.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.40	0.41	< 0.005	0.02	—	0.02	0.02	—	0.02	—	64.8	64.8	< 0.005	< 0.005	—	65.1
Dust From Material Movement	—	—	—	—	—	—	0.16	0.16	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.61	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	92.9	92.9	0.01	< 0.005	0.37	94.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.87	1.87	< 0.005	< 0.005	< 0.005	1.90
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.31	0.31	< 0.005	< 0.005	< 0.005	0.32
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.29	0.24	2.28	2.67	< 0.005	0.10	—	0.10	0.09	—	0.09	—	488	488	0.02	< 0.005	—	490
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.42	0.49	< 0.005	0.02	—	0.02	0.02	—	0.02	—	80.8	80.8	< 0.005	< 0.005	—	81.1
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.29	0.27	0.15	2.40	0.00	0.00	0.32	0.32	0.00	0.08	0.08	—	366	366	0.02	0.02	1.46	372
Vendor	0.01	0.01	0.19	0.09	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	117	117	< 0.005	0.02	0.30	123

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.25	0.23	0.19	1.94	0.00	0.00	0.32	0.32	0.00	0.08	0.08	—	324	324	0.02	0.02	0.04	329
Vendor	0.01	0.01	0.20	0.09	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	118	118	< 0.005	0.02	0.01	123
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.03	0.40	0.00	0.00	0.06	0.06	0.00	0.02	0.02	—	68.4	68.4	< 0.005	< 0.005	0.13	69.6
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	23.9	23.9	< 0.005	< 0.005	0.03	25.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.3	11.3	< 0.005	< 0.005	0.02	11.5
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.96	3.96	< 0.005	< 0.005	< 0.005	4.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.58	0.48	4.48	5.59	0.01	0.19	—	0.19	0.17	—	0.17	—	1,028	1,028	0.04	0.01	—	1,031
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.82	1.02	< 0.005	0.03	—	0.03	0.03	—	0.03	—	170	170	0.01	< 0.005	—	171
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.27	0.25	0.13	2.20	0.00	0.00	0.32	0.32	0.00	0.08	0.08	—	358	358	0.01	0.02	1.34	364
Vendor	0.01	0.01	0.19	0.08	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	115	115	< 0.005	0.02	0.30	121
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.22	0.16	1.78	0.00	0.00	0.32	0.32	0.00	0.08	0.08	—	318	318	0.01	0.02	0.03	323

Vendor	0.01	0.01	0.20	0.09	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	116	116	< 0.005	0.02	0.01	121
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.10	0.06	0.78	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	141	141	0.01	0.01	0.25	143
Vendor	< 0.005	< 0.005	0.08	0.04	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	49.5	49.5	< 0.005	0.01	0.06	51.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.14	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	23.3	23.3	< 0.005	< 0.005	0.04	23.7
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	8.19	8.19	< 0.005	< 0.005	0.01	8.56
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.71	6.52	8.84	0.01	0.29	—	0.29	0.26	—	0.26	—	1,351	1,351	0.05	0.01	—	1,355
Paving	0.14	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.04	0.04	0.32	0.44	< 0.005	0.01	—	0.01	0.01	—	0.01	—	66.6	66.6	< 0.005	< 0.005	—	66.8
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.0	11.0	< 0.005	< 0.005	—	11.1
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.09	0.05	0.74	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	121	121	< 0.005	0.01	0.45	123
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.50	5.50	< 0.005	< 0.005	0.01	5.59
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.91	0.91	< 0.005	< 0.005	< 0.005	0.93
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	19.5	19.5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.04	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.58	6.58	< 0.005	< 0.005	—	6.61
Architectural Coatings	0.96	0.96	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.09	1.09	< 0.005	< 0.005	—	1.09
Architectural Coatings	0.18	0.18	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.03	0.44	0.00	0.00	0.06	0.06	0.00	0.02	0.02	—	71.6	71.6	< 0.005	< 0.005	0.27	72.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.25	3.25	< 0.005	< 0.005	0.01	3.30
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.54	0.54	< 0.005	< 0.005	< 0.005	0.55
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	1.84	1.74	1.34	11.1	0.02	0.02	1.91	1.93	0.02	0.48	0.50	—	2,458	2,458	0.12	0.13	9.01	2,507
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.84	1.74	1.34	11.1	0.02	0.02	1.91	1.93	0.02	0.48	0.50	—	2,458	2,458	0.12	0.13	9.01	2,507
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	1.64	1.52	1.53	9.95	0.02	0.02	1.91	1.93	0.02	0.48	0.50	—	2,255	2,255	0.14	0.14	0.23	2,299
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.64	1.52	1.53	9.95	0.02	0.02	1.91	1.93	0.02	0.48	0.50	—	2,255	2,255	0.14	0.14	0.23	2,299
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.29	0.27	0.25	1.70	< 0.005	< 0.005	0.33	0.33	< 0.005	0.08	0.09	—	364	364	0.02	0.02	0.61	371
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.29	0.27	0.25	1.70	< 0.005	< 0.005	0.33	0.33	< 0.005	0.08	0.09	—	364	364	0.02	0.02	0.61	371

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	225	225	0.04	< 0.005	—	228
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	19.9	19.9	< 0.005	< 0.005	—	20.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	245	245	0.04	< 0.005	—	248
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	225	225	0.04	< 0.005	—	228
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	19.9	19.9	< 0.005	< 0.005	—	20.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	245	245	0.04	< 0.005	—	248
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	37.3	37.3	0.01	< 0.005	—	37.7
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	3.29	3.29	< 0.005	< 0.005	—	3.32
Total	—	—	—	—	—	—	—	—	—	—	—	—	40.6	40.6	0.01	< 0.005	—	41.0

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.06	0.03	0.52	0.22	< 0.005	0.04	—	0.04	0.04	—	0.04	—	661	661	0.06	< 0.005	—	663
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.06	0.03	0.52	0.22	< 0.005	0.04	—	0.04	0.04	—	0.04	—	661	661	0.06	< 0.005	—	663
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.06	0.03	0.52	0.22	< 0.005	0.04	—	0.04	0.04	—	0.04	—	661	661	0.06	< 0.005	—	663
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.06	0.03	0.52	0.22	< 0.005	0.04	—	0.04	0.04	—	0.04	—	661	661	0.06	< 0.005	—	663
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.01	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	—	109	109	0.01	< 0.005	—	110
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	—	109	109	0.01	< 0.005	—	110

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	4.20	2.08	0.98	18.8	0.06	2.70	—	2.70	2.60	—	2.60	446	863	1,309	2.10	< 0.005	—	1,362
Consumer Products	1.17	1.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.44	0.42	0.05	4.64	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.4	12.4	< 0.005	< 0.005	—	12.5
Total	5.90	3.76	1.03	23.4	0.06	2.70	—	2.70	2.60	—	2.60	446	876	1,321	2.10	< 0.005	—	1,374
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	4.20	2.08	0.98	18.8	0.06	2.70	—	2.70	2.60	—	2.60	446	863	1,309	2.10	< 0.005	—	1,362
Consumer Products	1.17	1.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	5.46	3.34	0.98	18.8	0.06	2.70	—	2.70	2.60	—	2.60	446	863	1,309	2.10	< 0.005	—	1,362
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.17	0.09	0.04	0.77	< 0.005	0.11	—	0.11	0.11	—	0.11	16.6	32.1	48.7	0.08	< 0.005	—	50.7
Consumer Products	0.21	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.04	0.04	< 0.005	0.42	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.02	1.02	< 0.005	< 0.005	—	1.02
Total	0.44	0.35	0.04	1.19	< 0.005	0.11	—	0.11	0.11	—	0.11	16.6	33.1	49.7	0.08	< 0.005	—	51.7

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	6.33	8.74	15.1	0.65	0.02	—	36.0
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	6.33	8.74	15.1	0.65	0.02	—	36.0
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	6.33	8.74	15.1	0.65	0.02	—	36.0
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	6.33	8.74	15.1	0.65	0.02	—	36.0
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments	—	—	—	—	—	—	—	—	—	—	—	1.05	1.45	2.50	0.11	< 0.005	—	5.96
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	1.05	1.45	2.50	0.11	< 0.005	—	5.96

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	32.6	0.00	32.6	3.26	0.00	—	114
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	32.6	0.00	32.6	3.26	0.00	—	114
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	32.6	0.00	32.6	3.26	0.00	—	114
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	32.6	0.00	32.6	3.26	0.00	—	114
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	5.40	0.00	5.40	0.54	0.00	—	18.9

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	5.40	0.00	5.40	0.54	0.00	—	18.9

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.39	0.39
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.39	0.39
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.39	0.39
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.39	0.39
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	8/30/2024	9/6/2024	5.00	5.00	—

Grading	Grading	9/7/2024	9/18/2024	5.00	8.00	—
Building Construction	Building Construction	9/19/2024	8/7/2025	5.00	230	—
Paving	Paving	8/8/2025	9/2/2025	5.00	18.0	—
Architectural Coating	Architectural Coating	9/3/2025	9/28/2025	5.00	18.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Back hoes	Diesel	Average	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	2.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	6.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	6.00	36.0	0.38
Paving	Tractors/Loaders/Back hoes	Diesel	Average	1.00	8.00	84.0	0.37

Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	7.70	LDA,LDT1,LDT2
Site Preparation	Vendor	—	4.00	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	7.70	LDA,LDT1,LDT2
Grading	Vendor	—	4.00	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	59.0	7.70	LDA,LDT1,LDT2
Building Construction	Vendor	8.77	4.00	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	20.0	7.70	LDA,LDT1,LDT2
Paving	Vendor	—	4.00	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	11.8	7.70	LDA,LDT1,LDT2

Architectural Coating	Vendor	—	4.00	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	109,943	36,648	0.00	0.00	2,436

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	7.50	0.00	—
Grading	—	—	8.00	0.00	—
Paving	0.00	0.00	0.00	0.00	0.93

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Apartments Mid Rise	—	0%
Parking Lot	0.93	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	204	0.03	< 0.005
2025	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments Mid Rise	446	403	335	154,781	2,699	2,436	2,029	936,388
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments Mid Rise	—
Wood Fireplaces	0
Gas Fireplaces	41
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	41
Conventional Wood Stoves	0
Catalytic Wood Stoves	4

Non-Catalytic Wood Stoves	4
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
109943.325	36,648	0.00	0.00	2,436

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	403,341	204	0.0330	0.0040	2,062,851
Parking Lot	35,572	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	3,304,272	1,087,782
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	60.5	—
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit

Temperature and Extreme Heat	30.9	annual days of extreme heat
Extreme Precipitation	1.35	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	4	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	0	0	0	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	4	1	1	4
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	1	1	1	2
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	82.5
AQ-PM	94.6
AQ-DPM	19.6
Drinking Water	96.0
Lead Risk Housing	12.2
Pesticides	75.3
Toxic Releases	71.9

Traffic	53.3
Effect Indicators	—
CleanUp Sites	19.9
Groundwater	2.11
Haz Waste Facilities/Generators	35.6
Impaired Water Bodies	23.9
Solid Waste	0.00
Sensitive Population	—
Asthma	55.9
Cardio-vascular	23.1
Low Birth Weights	25.4
Socioeconomic Factor Indicators	—
Education	7.40
Housing	23.4
Linguistic	14.3
Poverty	6.08
Unemployment	7.14

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	85.05068651
Employed	83.80597973
Median HI	87.12947517
Education	—
Bachelor's or higher	84.97369434
High school enrollment	17.31040678

Preschool enrollment	41.72975747
Transportation	—
Auto Access	48.06877967
Active commuting	7.596561016
Social	—
2-parent households	29.20569742
Voting	90.79943539
Neighborhood	—
Alcohol availability	76.44039523
Park access	18.23431284
Retail density	29.44950597
Supermarket access	61.94020275
Tree canopy	85.16617477
Housing	—
Homeownership	89.86269729
Housing habitability	81.05992557
Low-inc homeowner severe housing cost burden	72.02617734
Low-inc renter severe housing cost burden	31.52829462
Uncrowded housing	96.93314513
Health Outcomes	—
Insured adults	93.81496215
Arthritis	2.7
Asthma ER Admissions	53.8
High Blood Pressure	3.1
Cancer (excluding skin)	1.8
Asthma	76.7
Coronary Heart Disease	6.2
Chronic Obstructive Pulmonary Disease	37.6

Diagnosed Diabetes	44.3
Life Expectancy at Birth	20.4
Cognitively Disabled	25.4
Physically Disabled	17.3
Heart Attack ER Admissions	69.8
Mental Health Not Good	91.8
Chronic Kidney Disease	20.1
Obesity	77.3
Pedestrian Injuries	19.6
Physical Health Not Good	71.4
Stroke	26.0
Health Risk Behaviors	—
Binge Drinking	83.4
Current Smoker	96.7
No Leisure Time for Physical Activity	76.1
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	92.2
Elderly	3.1
English Speaking	68.5
Foreign-born	6.6
Outdoor Workers	80.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	75.3
Traffic Density	36.4
Traffic Access	0.0
Other Indices	—

Hardship	7.5
Other Decision Support	—
2016 Voting	84.2

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	23.0
Healthy Places Index Score for Project Location (b)	75.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	From Design Exhibit H
Construction: Construction Phases	no demolition required. open field

Exhibit B

Air Dispersion Model and HRA Spreadsheets

Emissions of DPM During Construction

Phase	Year	Emissions*	Duration	Total Emissions For Phase	Total Hours	Emissions Per Day Averaged Over Project Duration	Emission Rate Per Hour	Site Wide Hourly Emission Rate	Weighted Site Wide Annual Emission Rate
		lbs/day	days	lbs		lbs/day	lbs-hour	lbs-hr/ft2	
Site Preparation	2024	1.6	5	8	40	2.87E-02	2.00E-01	1.24E-06	2.23E-08
Grading	2024	0.84	8	6.72	64	2.41E-02	1.05E-01	6.53E-07	1.87E-08
Building Construction	2024	0.5	68	34	544	1.22E-01	6.25E-02	3.89E-07	9.48E-08
Building Construction	2025	0.43	162	69.66	1296	2.50E-01	5.38E-02	3.35E-07	1.94E-07
Paving	2025	0.29	18	5.22	144	1.87E-02	3.63E-02	2.26E-07	1.46E-08
Architectural Coating	2025	0.03	18	0.54	144	1.94E-03	3.75E-03	2.33E-08	1.51E-09
Total			279	123.6	2232	0.443010753		2.87E-06	3.46E-07

```
** BREEZE AERMOD
** Trinity Consultants
** VERSION  11.0

CO STARTING
CO TITLEONE  Construction Phase Of 7056 North Prospect Ave Project
CO TITLETWO  DPM Emissions From Off-Road Construction Equipment - Only Weekday Work
CO MODELOPT  DFAULT  CONC  NODRYDPLT  NOWETDPLT
CO RUNORNOT  RUN
CO AVERTIME  ANNUAL
CO POLLUTID  DPM
CO FINISHED

SO STARTING
SO ELEVUNIT  METERS
SO LOCATION  JOO601AS  AREAPOLY  245661.2  4080774.5  99.19
** SRCDESCR  7056 Project Site
SO SRCPARAM  JOO601AS  3.46E-07  4.3  12  2.15
SO AREAVERT  JOO601AS  245661.2 4080774.5  245549.4 4080775.9  245542.8 4080768.7  245546.5 4080731.5
SO AREAVERT  JOO601AS  245549.4 4080725.7  245557.7 4080723.1  245557.7 4080705.7  245554.5 4080701.3
SO AREAVERT  JOO601AS  245552.6 4080690  245555.9 4080643  245662.6 4080641.2  245661.2 4080774.5
SO EMISFACT  JOO601AS  HRDOW  0  0  0  0  0  0  0  1  1  1  1  0  1  1  1  1  0  0  0  0  0  0  0  0  0  0
SO EMISFACT  JOO601AS  HRDOW  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0
SO EMISFACT  JOO601AS  HRDOW  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0
SO SRCGROUP  ALL
SO FINISHED

RE STARTING
RE ELEVUNIT  METERS
RE DISCCART  245689.9  4080671.2  99.06  99.06
** RCPDESCR  homes to east
RE DISCCART  245714.9  4080671.2  99.06  99.06
** RCPDESCR  homes to east
RE DISCCART  245739.9  4080671.2  99.06  99.06
** RCPDESCR  homes to east
RE DISCCART  245764.9  4080671.2  99.06  99.06
** RCPDESCR  homes to east
RE DISCCART  245789.9  4080671.2  99.06  99.06
** RCPDESCR  homes to east
RE DISCCART  245814.9  4080671.2  99.06  99.06
** RCPDESCR  homes to east
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** RCPDESCR  homes to east
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** RCPDESCR  homes to east
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** RCPDESCR  homes to east
RE DISCCART  245764.9  4080696.2  99.23  99.23
** RCPDESCR  homes to east
RE DISCCART  245789.9  4080696.2  99.23  99.23
** RCPDESCR  homes to east
RE DISCCART  245814.9  4080696.2  99.23  99.23
** RCPDESCR  homes to east
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** RCPDESCR  homes to east
RE DISCCART  245764.9  4080721.2  99.36  99.36
** RCPDESCR  homes to east
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RE DISCCART  245789.9  4080721.2  99.36  99.36
** RCPDESCR  homes to east
RE DISCCART  245814.9  4080721.2  99.36  99.36
** RCPDESCR  homes to east
RE DISCCART  245839.9  4080721.2  99.36  99.36
** RCPDESCR  homes to east
RE DISCCART  245864.9  4080721.2  99.36  99.36
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** RCPDESCR  homes to east
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** RCPDESCR  homes to east
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** RCPDESCR  homes to east
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** RCPDESCR  homes to east
RE DISCCART  245814.9  4080746.2  99.36  99.36
** RCPDESCR  homes to east
RE DISCCART  245839.9  4080746.2  99.36  99.36
** RCPDESCR  homes to east
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** RCPDESCR  homes to east
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** RCPDESCR  homes to east
RE DISCCART  245714.9  4080771.2  99.36  99.36
** RCPDESCR  homes to east
RE DISCCART  245739.9  4080771.2  99.36  99.36
** RCPDESCR  homes to east
RE DISCCART  245764.9  4080771.2  99.36  99.36
** RCPDESCR  homes to east
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** RCPDESCR  homes to east
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** RCPDESCR  homes to east
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** RCPDESCR  homes to east
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** RCPDESCR  homes to east
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** RCPDESCR  homes to east
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** RCPDESCR  Homes to NE
RE DISCCART  245710.3  4080822.7  99.36  99.36
** RCPDESCR  Homes to NE
RE DISCCART  245735.3  4080822.7  99.36  99.36
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```
** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  elementary school
RE DISCCART  245349.3  4080786.2  98.45  98.45
** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
RE DISCCART  245349.3  4080836.2  98.45  98.45
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
RE DISCCART  245399.3  4080861.2  98.76  98.76
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
RE DISCCART  245324.3  4080911.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245349.3  4080911.2  98.76  98.76
** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
RE DISCCART  245324.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245349.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245374.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245399.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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RE DISCCART  245589.6  4080447.7  97.54  97.54
** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
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RE DISCCART  245764.6  4080522.7  98.07  98.07
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** RCPDESCR  Homes to SE
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
RE DISCCART  245321.9  4080519.4  97.54  97.54
** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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RE DISCCART  245296.9  4080544.4  97.54  97.54
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RE DISCCART  245321.9  4080544.4  97.55  97.55
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** RCPDESCR  homes to SW
RE DISCCART  245271.9  4080569.4  97.63  97.63
** RCPDESCR  homes to SW
RE DISCCART  245296.9  4080569.4  97.63  97.63
** RCPDESCR  homes to SW
RE DISCCART  245321.9  4080569.4  97.66  97.66
** RCPDESCR  homes to SW
RE DISCCART  245346.9  4080569.4  97.83  97.83
** RCPDESCR  homes to SW
RE DISCCART  245371.9  4080569.4  97.84  97.84
** RCPDESCR  homes to SW
RE DISCCART  245396.9  4080569.4  97.9  97.9
** RCPDESCR  homes to SW
RE DISCCART  245421.9  4080569.4  97.94  97.94
** RCPDESCR  homes to SW
RE DISCCART  245446.9  4080569.4  97.94  97.94
** RCPDESCR  homes to SW
RE DISCCART  245471.9  4080569.4  97.95  97.95
** RCPDESCR  homes to SW
RE DISCCART  245496.9  4080569.4  98.03  98.03
** RCPDESCR  homes to SW
RE DISCCART  245521.9  4080569.4  98.28  98.28
** RCPDESCR  homes to SW
RE FINISHED

ME STARTING
ME SURFFILE  "C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.SFC"
** SURFFILE  "C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.SFC"
ME PROFFILE  "C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.PFL"
** PROFFILE  "C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.PFL"
ME SURFDATA  93193 2018
ME UAIRDATA  23230 2018
ME PROFBASE  10  METERS
ME FINISHED

OU STARTING
OU FILEFORM  FIX
OU PLOTFILE  ANNUAL  ALL  ALL`ANNUAL.plt  10000
OU POSTFILE  ANNUAL  ALL  UNFORM  ALL`ANNUAL.bin  10001
OU FINISHED


  *** Message Summary For AERMOD Model Setup ***

  --------- Summary of Total Messages --------

 A Total of            0 Fatal Error Message(s)
 A Total of            4 Warning Message(s)
 A Total of            0 Informational Message(s)
```

```
   ******** FATAL ERROR MESSAGES ********
              ***  NONE  ***


   ********   WARNING MESSAGES   ********
 ME W186     606       MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used          0.50
 ME W187     606       MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET
 OU W565     610       PERPLT: Possible Conflict With Dynamically Allocated FUNIT     PLOTFILE
 OU W565     611       PERPST: Possible Conflict With Dynamically Allocated FUNIT     POSTFILE

 ***********************************
 *** SETUP Finishes Successfully ***
 ***********************************

↑ *** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project            ***
    07/17/24
 *** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
   16:49:31

   PAGE   1
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                                        ***     MODEL SETUP OPTIONS SUMMARY       ***
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - -

 ** Model Options Selected:
      * Model Uses Regulatory DEFAULT Options
      * Model Is Setup For Calculation of Average CONCentration Values.
      * NO GAS DEPOSITION Data Provided.
      * NO PARTICLE DEPOSITION Data Provided.
      * Model Uses NO DRY DEPLETION. DDPLETE  =  F
      * Model Uses NO WET DEPLETION. WETDPLT  =  F
      * Stack-tip Downwash.
      * Model Accounts for ELEVated Terrain Effects.
      * Use Calms Processing Routine.
      * Use Missing Data Processing Routine.
      * No Exponential Decay.
      * Model Uses RURAL Dispersion Only.
      * ADJ_U*   - Use ADJ_U* option for SBL in AERMET
      * CCVR_Sub - Meteorological data includes CCVR substitutions
      * TEMP_Sub - Meteorological data includes TEMP substitutions
      * Model Assumes No FLAGPOLE Receptor Heights.
      * The User Specified a Pollutant Type of: DPM

 **Model Calculates ANNUAL Averages Only

 **This Run Includes:      1 Source(s);       1 Source Group(s); and     283 Receptor(s)

               with:      0 POINT(s), including
                          0 POINTCAP(s) and      0 POINTHOR(s)
                and:      0 VOLUME source(s)
                and:      1 AREA type source(s)
                and:      0 LINE source(s)
                and:      0 RLINE/RLINEXT source(s)
                and:      0 OPENPIT source(s)
                and:      0 BUOYANT LINE source(s) with a total of     0 line(s)
                and:      0 SWPOINT source(s)


 **Model Set To Continue RUNning After the Setup Testing.

 **The AERMET Input Meteorological Data Version Date:  21112

 **Output Options Selected:
          Model Outputs Tables of ANNUAL Averages by Receptor
          Model Outputs External File(s) of Concurrent Values for Postprocessing (POSTFILE Keyword)
```

```
         Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)

 **NOTE:  The Following Flags May Appear Following CONC Values:  c for Calm Hours
                                                                 m for Missing Hours
                                                                 b for Both Calm and Missing Hours

 **Misc. Inputs:  Base Elev. for Pot. Temp. Profile (m MSL) =    10.00 ;  Decay Coef. =    0.000     ;  Rot. Angle
=     0.0
                  Emission Units = GRAMS/SEC                                ;  Emission Rate Unit Factor =
0.10000E+07
                  Output Units   = MICROGRAMS/M**3

 **Approximate Storage Requirements of Model =      3.5 MB of RAM.

 **Input Runstream File:          aermod.inp

 **Output Print File:             aermod.out


 *** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project               ***
     07/17/24
 *** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
   16:49:31

   PAGE   2
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*


                                          *** AREAPOLY SOURCE DATA ***

              NUMBER EMISSION RATE   LOCATION OF AREA  BASE     RELEASE  NUMBER      INIT.   URBAN  EMISSION RATE
   SOURCE      PART.  (GRAMS/SEC       X        Y      ELEV.    HEIGHT  OF VERTS.     SZ     SOURCE  SCALAR VARY
     ID        CATS.   /METER**2)   (METERS) (METERS) (METERS) (METERS)            (METERS)              BY
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - -

 JOO601AS         0   0.34600E-06  245661.2 4080774.5    99.2     4.30      12         2.15     NO    HRDOW
 *** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project               ***
     07/17/24
 *** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
   16:49:31

   PAGE   3
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*


                                       *** SOURCE IDs DEFINING SOURCE GROUPS ***

 SRCGROUP ID                                          SOURCE IDs
 -----------                                          ----------


  ALL        JOO601AS    ,
 *** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project               ***
     07/17/24
 *** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
   16:49:31

   PAGE   4
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

 SOURCE ID = JOO601AS     ; SOURCE TYPE = AREAPOLY :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR
HOUR   SCALAR
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - -
                                              DAY OF WEEK = WEEKDAY
```

```
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6  .0000E+00    7  .0000E+00
8  .1000E+01
   9  .1000E+01   10  .1000E+01   11  .1000E+01   12  .0000E+00   13  .1000E+01   14  .1000E+01   15  .1000E+01
16  .1000E+01
  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22  .0000E+00   23  .0000E+00
24  .0000E+00
                                          DAY OF WEEK = SATURDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6  .0000E+00    7  .0000E+00
8  .0000E+00
   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14  .0000E+00   15  .0000E+00
16  .0000E+00
  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22  .0000E+00   23  .0000E+00
24  .0000E+00
                                          DAY OF WEEK = SUNDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6  .0000E+00    7  .0000E+00
8  .0000E+00
   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14  .0000E+00   15  .0000E+00
16  .0000E+00
  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22  .0000E+00   23  .0000E+00
24  .0000E+00
*** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project                ***
    07/17/24
*** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
  16:49:31

  PAGE   5
*** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                                   *** DISCRETE CARTESIAN RECEPTORS ***
                                (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
                                              (METERS)

    ( 245689.9, 4080671.2,      99.1,      99.1,      0.0);        ( 245714.9, 4080671.2,      99.1,      99.1,
    0.0);
    ( 245739.9, 4080671.2,      99.1,      99.1,      0.0);        ( 245764.9, 4080671.2,      99.1,      99.1,
    0.0);
    ( 245789.9, 4080671.2,      99.1,      99.1,      0.0);        ( 245814.9, 4080671.2,      99.1,      99.1,
    0.0);
    ( 245839.9, 4080671.2,      99.1,      99.1,      0.0);        ( 245864.9, 4080671.2,      99.3,      99.3,
    0.0);
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    0.0);
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    0.0);
    ( 245789.9, 4080696.2,      99.2,      99.2,      0.0);        ( 245814.9, 4080696.2,      99.2,      99.2,
    0.0);
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    0.0);
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    0.0);
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    ( 245789.9, 4080721.2,      99.4,      99.4,      0.0);        ( 245814.9, 4080721.2,      99.4,      99.4,
    0.0);
    ( 245839.9, 4080721.2,      99.4,      99.4,      0.0);        ( 245864.9, 4080721.2,      99.4,      99.4,
    0.0);
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    0.0);
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    0.0);
    ( 245789.9, 4080746.2,      99.4,      99.4,      0.0);        ( 245814.9, 4080746.2,      99.4,      99.4,
    0.0);
    ( 245839.9, 4080746.2,      99.4,      99.4,      0.0);        ( 245864.9, 4080746.2,      99.4,      99.4,
    0.0);
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    0.0);
    ( 245739.9, 4080771.2,      99.4,      99.4,      0.0);        ( 245764.9, 4080771.2,      99.4,      99.4,
    0.0);
    ( 245789.9, 4080771.2,      99.4,      99.4,      0.0);        ( 245814.9, 4080771.2,      99.4,      99.4,
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    0.0);
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    0.0);
    ( 245864.9, 4080796.2,      99.4,      99.4,      0.0);        ( 245789.9, 4080821.2,      99.4,      99.4,
    0.0);
    ( 245814.9, 4080821.2,      99.4,      99.4,      0.0);        ( 245839.9, 4080821.2,      99.4,      99.4,
    0.0);
    ( 245864.9, 4080821.2,      99.4,      99.4,      0.0);        ( 245814.9, 4080846.2,      99.4,      99.4,
    0.0);
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    0.0);
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    0.0);
    ( 245735.3, 4080822.7,      99.4,      99.4,      0.0);        ( 245685.3, 4080847.7,      99.2,      99.2,
    0.0);
    ( 245710.3, 4080847.7,      99.4,      99.4,      0.0);        ( 245735.3, 4080847.7,      99.4,      99.4,
    0.0);
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    0.0);
    ( 245710.3, 4080872.7,      99.4,      99.4,      0.0);        ( 245735.3, 4080872.7,      99.4,      99.4,
    0.0);
    ( 245760.3, 4080872.7,      99.4,      99.4,      0.0);        ( 245785.3, 4080872.7,      99.4,      99.4,
    0.0);
    ( 245810.3, 4080872.7,      99.4,      99.4,      0.0);        ( 245835.3, 4080872.7,      99.4,      99.4,
    0.0);
    ( 245860.3, 4080872.7,      99.7,      99.7,      0.0);        ( 245685.3, 4080897.7,      99.1,      99.1,
    0.0);
    ( 245710.3, 4080897.7,      99.4,      99.4,      0.0);        ( 245735.3, 4080897.7,      99.4,      99.4,
    0.0);
    ( 245760.3, 4080897.7,      99.4,      99.4,      0.0);        ( 245785.3, 4080897.7,      99.4,      99.4,
    0.0);
    ( 245810.3, 4080897.7,      99.4,      99.4,      0.0);        ( 245835.3, 4080897.7,      99.4,      99.4,
    0.0);
    ( 245860.3, 4080897.7,      99.7,      99.7,      0.0);        ( 245685.3, 4080922.7,      99.1,      99.1,
    0.0);
    ( 245710.3, 4080922.7,      99.3,      99.3,      0.0);        ( 245735.3, 4080922.7,      99.3,      99.3,
    0.0);
    ( 245760.3, 4080922.7,      99.4,      99.4,      0.0);        ( 245785.3, 4080922.7,      99.4,      99.4,
    0.0);
    ( 245810.3, 4080922.7,      99.4,      99.4,      0.0);        ( 245835.3, 4080922.7,      99.4,      99.4,
    0.0);
    ( 245860.3, 4080922.7,      99.7,      99.7,      0.0);        ( 245685.3, 4080947.7,      99.1,      99.1,
    0.0);
    ( 245710.3, 4080947.7,      99.1,      99.1,      0.0);        ( 245735.3, 4080947.7,      99.1,      99.1,
    0.0);
    ( 245760.3, 4080947.7,      99.3,      99.3,      0.0);        ( 245785.3, 4080947.7,      99.4,      99.4,
    0.0);
    ( 245810.3, 4080947.7,      99.4,      99.4,      0.0);        ( 245835.3, 4080947.7,      99.4,      99.4,
    0.0);
*** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project                ***
    07/17/24
*** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
  16:49:31

  PAGE   6
*** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                                    *** DISCRETE CARTESIAN RECEPTORS ***
                                (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
                                              (METERS)

    ( 245860.3, 4080947.7,      99.7,      99.7,      0.0);        ( 245835.3, 4080972.7,      99.4,      99.4,
    0.0);
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    0.0);
```

```
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0.0);
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0.0);
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0.0);
( 245474.3, 4080786.2,      98.8,      98.8,      0.0);      ( 245499.3, 4080786.2,      98.9,      98.9,
0.0);
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0.0);
( 245349.3, 4080811.2,      98.5,      98.5,      0.0);      ( 245374.3, 4080811.2,      98.5,      98.5,
0.0);
( 245399.3, 4080811.2,      98.5,      98.5,      0.0);      ( 245424.3, 4080811.2,      98.7,      98.7,
0.0);
( 245449.3, 4080811.2,      98.8,      98.8,      0.0);      ( 245474.3, 4080811.2,      98.8,      98.8,
0.0);
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0.0);
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0.0);
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0.0);
( 245474.3, 4080836.2,      98.8,      98.8,      0.0);      ( 245499.3, 4080836.2,      98.8,      98.8,
0.0);
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0.0);
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0.0);
( 245424.3, 4080861.2,      98.8,      98.8,      0.0);      ( 245449.3, 4080861.2,      98.8,      98.8,
0.0);
( 245474.3, 4080861.2,      98.8,      98.8,      0.0);      ( 245499.3, 4080861.2,      98.8,      98.8,
0.0);
( 245299.3, 4080886.2,      98.7,      98.7,      0.0);      ( 245324.3, 4080886.2,      98.7,      98.7,
0.0);
( 245349.3, 4080886.2,      98.7,      98.7,      0.0);      ( 245374.3, 4080886.2,      98.8,      98.8,
0.0);
( 245399.3, 4080886.2,      98.8,      98.8,      0.0);      ( 245424.3, 4080886.2,      98.8,      98.8,
0.0);
( 245449.3, 4080886.2,      98.8,      98.8,      0.0);      ( 245474.3, 4080886.2,      98.8,      98.8,
0.0);
( 245499.3, 4080886.2,      98.8,      98.8,      0.0);      ( 245299.3, 4080911.2,      98.8,      98.8,
0.0);
( 245324.3, 4080911.2,      98.8,      98.8,      0.0);      ( 245349.3, 4080911.2,      98.8,      98.8,
0.0);
( 245374.3, 4080911.2,      98.8,      98.8,      0.0);      ( 245399.3, 4080911.2,      98.8,      98.8,
0.0);
( 245424.3, 4080911.2,      98.8,      98.8,      0.0);      ( 245449.3, 4080911.2,      98.8,      98.8,
0.0);
( 245474.3, 4080911.2,      98.8,      98.8,      0.0);      ( 245499.3, 4080911.2,      98.8,      98.8,
0.0);
( 245299.3, 4080936.2,      98.8,      98.8,      0.0);      ( 245324.3, 4080936.2,      98.8,      98.8,
0.0);
( 245349.3, 4080936.2,      98.8,      98.8,      0.0);      ( 245374.3, 4080936.2,      98.8,      98.8,
0.0);
( 245399.3, 4080936.2,      98.8,      98.8,      0.0);      ( 245424.3, 4080936.2,      98.8,      98.8,
0.0);
( 245449.3, 4080936.2,      98.8,      98.8,      0.0);      ( 245474.3, 4080936.2,      98.8,      98.8,
0.0);
( 245499.3, 4080936.2,      98.8,      98.8,      0.0);      ( 245499.3, 4080961.2,      98.8,      98.8,
0.0);
( 245564.6, 4080447.7,      97.5,      97.5,      0.0);      ( 245589.6, 4080447.7,      97.5,      97.5,
0.0);
( 245614.6, 4080447.7,      97.5,      97.5,      0.0);      ( 245639.6, 4080447.7,      97.5,      97.5,
0.0);
( 245664.6, 4080447.7,      97.5,      97.5,      0.0);      ( 245689.6, 4080447.7,      97.5,      97.5,
0.0);
( 245714.6, 4080447.7,      97.5,      97.5,      0.0);      ( 245739.6, 4080447.7,      97.5,      97.5,
```

```
    0.0);
    ( 245564.6, 4080472.7,      97.5,      97.5,      0.0);        ( 245589.6, 4080472.7,      97.5,      97.5,
    0.0);
    ( 245614.6, 4080472.7,      97.5,      97.5,      0.0);        ( 245639.6, 4080472.7,      97.5,      97.5,
    0.0);
    ( 245664.6, 4080472.7,      97.5,      97.5,      0.0);        ( 245689.6, 4080472.7,      97.6,      97.6,
    0.0);
    ( 245714.6, 4080472.7,      97.6,      97.6,      0.0);        ( 245739.6, 4080472.7,      97.6,      97.6,
    0.0);
    ( 245764.6, 4080472.7,      97.6,      97.6,      0.0);        ( 245789.6, 4080472.7,      97.6,      97.6,
    0.0);
    ( 245564.6, 4080497.7,      97.5,      97.5,      0.0);        ( 245589.6, 4080497.7,      97.5,      97.5,
    0.0);
    ( 245614.6, 4080497.7,      97.5,      97.5,      0.0);        ( 245639.6, 4080497.7,      97.5,      97.5,
    0.0);
    ( 245664.6, 4080497.7,      97.7,      97.7,      0.0);        ( 245689.6, 4080497.7,      97.8,      97.8,
    0.0);
*** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project                ***
    07/17/24
*** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
  16:49:31

  PAGE   7
*** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                                    *** DISCRETE CARTESIAN RECEPTORS ***
                                (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
                                              (METERS)

    ( 245714.6, 4080497.7,      97.8,      97.8,      0.0);        ( 245739.6, 4080497.7,      97.8,      97.8,
    0.0);
    ( 245764.6, 4080497.7,      97.8,      97.8,      0.0);        ( 245789.6, 4080497.7,      97.8,      97.8,
    0.0);
    ( 245564.6, 4080522.7,      97.8,      97.8,      0.0);        ( 245589.6, 4080522.7,      97.8,      97.8,
    0.0);
    ( 245614.6, 4080522.7,      97.8,      97.8,      0.0);        ( 245639.6, 4080522.7,      97.9,      97.9,
    0.0);
    ( 245664.6, 4080522.7,      98.0,      98.0,      0.0);        ( 245689.6, 4080522.7,      98.1,      98.1,
    0.0);
    ( 245714.6, 4080522.7,      98.1,      98.1,      0.0);        ( 245739.6, 4080522.7,      98.1,      98.1,
    0.0);
    ( 245764.6, 4080522.7,      98.1,      98.1,      0.0);        ( 245789.6, 4080522.7,      98.1,      98.1,
    0.0);
    ( 245564.6, 4080547.7,      98.0,      98.0,      0.0);        ( 245589.6, 4080547.7,      98.0,      98.0,
    0.0);
    ( 245614.6, 4080547.7,      98.0,      98.0,      0.0);        ( 245639.6, 4080547.7,      98.2,      98.2,
    0.0);
    ( 245664.6, 4080547.7,      98.3,      98.3,      0.0);        ( 245689.6, 4080547.7,      98.3,      98.3,
    0.0);
    ( 245714.6, 4080547.7,      98.3,      98.3,      0.0);        ( 245739.6, 4080547.7,      98.3,      98.3,
    0.0);
    ( 245764.6, 4080547.7,      98.3,      98.3,      0.0);        ( 245789.6, 4080547.7,      98.5,      98.5,
    0.0);
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    0.0);
    ( 245614.6, 4080572.7,      98.4,      98.4,      0.0);        ( 245639.6, 4080572.7,      98.5,      98.5,
    0.0);
    ( 245664.6, 4080572.7,      98.6,      98.6,      0.0);        ( 245689.6, 4080572.7,      98.6,      98.6,
    0.0);
    ( 245714.6, 4080572.7,      98.6,      98.6,      0.0);        ( 245739.6, 4080572.7,      98.6,      98.6,
    0.0);
    ( 245764.6, 4080572.7,      98.6,      98.6,      0.0);        ( 245789.6, 4080572.7,      98.7,      98.7,
    0.0);
    ( 245221.9, 4080419.4,      97.2,      97.2,      0.0);        ( 245246.9, 4080419.4,      97.2,      97.2,
    0.0);
    ( 245271.9, 4080419.4,      97.2,      97.2,      0.0);        ( 245221.9, 4080444.4,      97.2,      97.2,
    0.0);
    ( 245246.9, 4080444.4,      97.2,      97.2,      0.0);        ( 245271.9, 4080444.4,      97.2,      97.2,
    0.0);
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( 245296.9, 4080444.4,      97.2,      97.2,      0.0);        ( 245321.9, 4080444.4,      97.3,      97.3,
0.0);
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0.0);
( 245271.9, 4080469.4,      97.2,      97.2,      0.0);        ( 245296.9, 4080469.4,      97.3,      97.3,
0.0);
( 245321.9, 4080469.4,      97.5,      97.5,      0.0);        ( 245346.9, 4080469.4,      97.5,      97.5,
0.0);
( 245371.9, 4080469.4,      97.5,      97.5,      0.0);        ( 245396.9, 4080469.4,      97.5,      97.5,
0.0);
( 245421.9, 4080469.4,      97.5,      97.5,      0.0);        ( 245221.9, 4080494.4,      97.5,      97.5,
0.0);
( 245246.9, 4080494.4,      97.5,      97.5,      0.0);        ( 245271.9, 4080494.4,      97.5,      97.5,
0.0);
( 245296.9, 4080494.4,      97.5,      97.5,      0.0);        ( 245321.9, 4080494.4,      97.5,      97.5,
0.0);
( 245346.9, 4080494.4,      97.5,      97.5,      0.0);        ( 245371.9, 4080494.4,      97.7,      97.7,
0.0);
( 245396.9, 4080494.4,      97.8,      97.8,      0.0);        ( 245421.9, 4080494.4,      97.7,      97.7,
0.0);
( 245446.9, 4080494.4,      97.5,      97.5,      0.0);        ( 245471.9, 4080494.4,      97.5,      97.5,
0.0);
( 245496.9, 4080494.4,      97.5,      97.5,      0.0);        ( 245521.9, 4080494.4,      97.5,      97.5,
0.0);
( 245221.9, 4080519.4,      97.5,      97.5,      0.0);        ( 245246.9, 4080519.4,      97.5,      97.5,
0.0);
( 245271.9, 4080519.4,      97.5,      97.5,      0.0);        ( 245296.9, 4080519.4,      97.5,      97.5,
0.0);
( 245321.9, 4080519.4,      97.5,      97.5,      0.0);        ( 245346.9, 4080519.4,      97.5,      97.5,
0.0);
( 245371.9, 4080519.4,      97.8,      97.8,      0.0);        ( 245396.9, 4080519.4,      97.8,      97.8,
0.0);
( 245421.9, 4080519.4,      97.8,      97.8,      0.0);        ( 245446.9, 4080519.4,      97.7,      97.7,
0.0);
( 245471.9, 4080519.4,      97.5,      97.5,      0.0);        ( 245496.9, 4080519.4,      97.5,      97.5,
0.0);
( 245521.9, 4080519.4,      97.7,      97.7,      0.0);        ( 245221.9, 4080544.4,      97.5,      97.5,
0.0);
( 245246.9, 4080544.4,      97.5,      97.5,      0.0);        ( 245271.9, 4080544.4,      97.5,      97.5,
0.0);
( 245296.9, 4080544.4,      97.5,      97.5,      0.0);        ( 245321.9, 4080544.4,      97.5,      97.5,
0.0);
( 245346.9, 4080544.4,      97.7,      97.7,      0.0);        ( 245371.9, 4080544.4,      97.8,      97.8,
0.0);
( 245396.9, 4080544.4,      97.8,      97.8,      0.0);        ( 245421.9, 4080544.4,      97.8,      97.8,
0.0);
( 245446.9, 4080544.4,      97.8,      97.8,      0.0);        ( 245471.9, 4080544.4,      97.7,      97.7,
0.0);
( 245496.9, 4080544.4,      97.7,      97.7,      0.0);        ( 245521.9, 4080544.4,      97.9,      97.9,
0.0);
*** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project                ***
07/17/24
*** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
16:49:31

PAGE   8
*** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                                   *** DISCRETE CARTESIAN RECEPTORS ***
                                (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
                                              (METERS)

( 245221.9, 4080569.4,      97.6,      97.6,      0.0);        ( 245246.9, 4080569.4,      97.6,      97.6,
0.0);
( 245271.9, 4080569.4,      97.6,      97.6,      0.0);        ( 245296.9, 4080569.4,      97.6,      97.6,
0.0);
( 245321.9, 4080569.4,      97.7,      97.7,      0.0);        ( 245346.9, 4080569.4,      97.8,      97.8,
0.0);
( 245371.9, 4080569.4,      97.8,      97.8,      0.0);        ( 245396.9, 4080569.4,      97.9,      97.9,
```

```
    0.0);
    ( 245421.9, 4080569.4,      97.9,      97.9,       0.0);        ( 245446.9, 4080569.4,      97.9,      97.9,
    0.0);
    ( 245471.9, 4080569.4,      98.0,      98.0,       0.0);        ( 245496.9, 4080569.4,      98.0,      98.0,
    0.0);
    ( 245521.9, 4080569.4,      98.3,      98.3,       0.0);
↑ *** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project              ***
    07/17/24
 *** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
   16:49:31

   PAGE   9
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                                    *** METEOROLOGICAL DAYS SELECTED FOR PROCESSING ***
                                                       (1=YES; 0=NO)

            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1

               NOTE:  METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA
FILE.


                              *** UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED CATEGORIES ***
                                                    (METERS/SEC)

                                         1.54,   3.09,   5.14,   8.23,  10.80,
↑ *** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project              ***
    07/17/24
 *** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
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   PAGE  10
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                                *** UP TO THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

   Surface file:   C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.SFC                         Met Version:
21112
   Profile file:   C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.PFL
   Surface format: FREE

   Profile format: FREE

   Surface station no.:     93193                Upper air station no.:     23230
                  Name: UNKNOWN                                 Name: UNKNOWN
                  Year:   2018                                  Year:   2018

 First 24 hours of scalar data
 YR MO DY JDY HR     H0     U*     W*  DT/DZ ZICNV ZIMCH  M-O LEN    Z0  BOWEN ALBEDO  REF WS   WD     HT  REF TA
  HT
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - -
```

```
18 01 01   1 01   -6.0  0.108 -9.000 -9.000 -999.   85.     18.7  0.17   1.06   1.00    1.20  347.   10.0  280.9
2.0
18 01 01   1 02   -2.0  0.062 -9.000 -9.000 -999.   38.     10.9  0.02   1.06   1.00    0.91  174.   10.0  279.2
2.0
18 01 01   1 03   -3.4  0.076 -9.000 -9.000 -999.   50.     11.8  0.03   1.06   1.00    1.20  265.   10.0  279.2
2.0
18 01 01   1 04   -5.1  0.095 -9.000 -9.000 -999.   71.     15.2  0.06   1.06   1.00    1.35  316.   10.0  278.1
2.0
18 01 01   1 05   -8.8  0.123 -9.000 -9.000 -999.  104.     19.1  0.04   1.06   1.00    1.87   96.   10.0  277.0
2.0
18 01 01   1 06   -2.6  0.067 -9.000 -9.000 -999.   43.     10.7  0.02   1.06   1.00    1.08  177.   10.0  277.5
2.0
18 01 01   1 07   -3.7  0.078 -9.000 -9.000 -999.   52.     11.5  0.02   1.06   1.00    1.33  181.   10.0  277.5
2.0
18 01 01   1 08  -15.2  0.167 -9.000 -9.000 -999.  164.     30.7  0.06   1.06   0.65    2.32   76.   10.0  276.4
2.0
18 01 01   1 09   -3.5  0.149 -9.000 -9.000 -999.  139.     86.8  0.04   1.06   0.36    2.15  109.   10.0  278.1
2.0
18 01 01   1 10   56.2  0.204  0.651  0.006  177.  221.    -13.6  0.04   1.06   0.26    2.37  134.   10.0  281.4
2.0
18 01 01   1 11   92.0  0.233  1.067  0.016  477.  270.    -12.4  0.04   1.06   0.22    2.62  105.   10.0  283.1
2.0
18 01 01   1 12  116.8  0.202  1.234  0.018  581.  219.     -6.4  0.04   1.06   0.21    2.11  102.   10.0  285.9
2.0
18 01 01   1 13  112.5  0.144  1.280  0.019  673.  132.     -2.4  0.02   1.06   0.21    1.55  183.   10.0  287.5
2.0
18 01 01   1 14   84.0  0.122  1.190  0.019  723.  103.     -2.0  0.02   1.06   0.22    1.28  200.   10.0  289.2
2.0
18 01 01   1 15   57.9  0.161  1.059  0.019  738.  155.     -6.5  0.03   1.06   0.26    1.81  262.   10.0  290.4
2.0
18 01 01   1 16   16.8  0.124  0.702  0.019  742.  105.    -10.3  0.03   1.06   0.35    1.47  259.   10.0  289.9
2.0
18 01 01   1 17   -2.5  0.068 -9.000 -9.000 -999.   44.     11.3  0.02   1.06   0.62    1.14  297.   10.0  287.5
2.0
18 01 01   1 18   -7.4  0.111 -9.000 -9.000 -999.   89.     16.9  0.03   1.06   1.00    1.84  239.   10.0  286.4
2.0
18 01 01   1 19   -4.0  0.085 -9.000 -9.000 -999.   60.     13.8  0.06   1.06   1.00    1.21   83.   10.0  284.9
2.0
18 01 01   1 20  -10.4  0.137 -9.000 -9.000 -999.  122.     22.3  0.06   1.06   1.00    1.93   76.   10.0  283.8
2.0
18 01 01   1 21   -4.7  0.090 -9.000 -9.000 -999.   65.     14.0  0.04   1.06   1.00    1.38  109.   10.0  283.1
2.0
18 01 01   1 22   -4.1  0.084 -9.000 -9.000 -999.   58.     13.0  0.04   1.06   1.00    1.30  127.   10.0  281.4
2.0
18 01 01   1 23  -11.7  0.145 -9.000 -9.000 -999.  133.     23.6  0.06   1.06   1.00    2.04   70.   10.0  280.9
2.0
18 01 01   1 24   -3.4  0.079 -9.000 -9.000 -999.   54.     13.0  0.06   1.06   1.00    1.09   80.   10.0  281.4
2.0


First hour of profile data
YR MO DY HR HEIGHT F  WDIR    WSPD AMB_TMP sigmaA  sigmaW  sigmaV
18 01 01 01   10.0 1  347.    1.20   281.0   99.0  -99.00  -99.00

F indicates top of profile (=1) or below (=0)
*** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project                 ***
    07/17/24
*** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
  16:49:31

  PAGE  11
*** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                  *** THE ANNUAL AVERAGE CONCENTRATION    VALUES AVERAGED OVER   5 YEARS FOR SOURCE GROUP: ALL
***
                                INCLUDING SOURCE(S):     JOO6O1AS    ,

                                          *** DISCRETE CARTESIAN RECEPTOR POINTS ***
```

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
245689.90	4080671.20	0.11757	245714.90	4080671.20	0.07252
245739.90	4080671.20	0.04710	245764.90	4080671.20	0.03210
245789.90	4080671.20	0.02278	245814.90	4080671.20	0.01672
245839.90	4080671.20	0.01264	245864.90	4080671.20	0.00980
245689.90	4080696.20	0.11503	245714.90	4080696.20	0.06783
245739.90	4080696.20	0.04241	245764.90	4080696.20	0.02819
245789.90	4080696.20	0.01974	245814.90	4080696.20	0.01443
245839.90	4080696.20	0.01092	245864.90	4080696.20	0.00851
245689.90	4080721.20	0.10227	245714.90	4080721.20	0.05707
245739.90	4080721.20	0.03465	245764.90	4080721.20	0.02286
245789.90	4080721.20	0.01609	245814.90	4080721.20	0.01190
245839.90	4080721.20	0.00914	245864.90	4080721.20	0.00723
245689.90	4080746.20	0.07687	245714.90	4080746.20	0.04157
245739.90	4080746.20	0.02564	245764.90	4080746.20	0.01740
245789.90	4080746.20	0.01261	245814.90	4080746.20	0.00958
245839.90	4080746.20	0.00753	245864.90	4080746.20	0.00608
245689.90	4080771.20	0.04405	245714.90	4080771.20	0.02676
245739.90	4080771.20	0.01796	245764.90	4080771.20	0.01294
245789.90	4080771.20	0.00979	245814.90	4080771.20	0.00768
245839.90	4080771.20	0.00619	245864.90	4080771.20	0.00510
245764.90	4080796.20	0.00971	245789.90	4080796.20	0.00765
245814.90	4080796.20	0.00619	245839.90	4080796.20	0.00510
245864.90	4080796.20	0.00428	245789.90	4080821.20	0.00606
245814.90	4080821.20	0.00502	245839.90	4080821.20	0.00422
245864.90	4080821.20	0.00360	245814.90	4080846.20	0.00415
245839.90	4080846.20	0.00354	245864.90	4080846.20	0.00305
245685.30	4080822.70	0.01741	245710.30	4080822.70	0.01269
245735.30	4080822.70	0.00968	245685.30	4080847.70	0.01232
245710.30	4080847.70	0.00943	245735.30	4080847.70	0.00746
245760.30	4080847.70	0.00607	245685.30	4080872.70	0.00921
245710.30	4080872.70	0.00731	245735.30	4080872.70	0.00594
245760.30	4080872.70	0.00494	245785.30	4080872.70	0.00417

245810.30	4080872.70	0.00357	245835.30	4080872.70	0.00308
245860.30	4080872.70	0.00268	245685.30	4080897.70	0.00717
245710.30	4080897.70	0.00583	245735.30	4080897.70	0.00484
245760.30	4080897.70	0.00409	245785.30	4080897.70	0.00351
245810.30	4080897.70	0.00305	245835.30	4080897.70	0.00267
245860.30	4080897.70	0.00235	245685.30	4080922.70	0.00576
245710.30	4080922.70	0.00477	245735.30	4080922.70	0.00402
245760.30	4080922.70	0.00344	245785.30	4080922.70	0.00299

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): JOO6O1AS ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
245810.30	4080922.70	0.00263	245835.30	4080922.70	0.00233
245860.30	4080922.70	0.00208	245685.30	4080947.70	0.00474
245710.30	4080947.70	0.00398	245735.30	4080947.70	0.00339
245760.30	4080947.70	0.00293	245785.30	4080947.70	0.00257
245810.30	4080947.70	0.00228	245835.30	4080947.70	0.00204
245860.30	4080947.70	0.00184	245835.30	4080972.70	0.00179
245860.30	4080972.70	0.00163	245299.30	4080786.20	0.00772
245324.30	4080786.20	0.00922	245349.30	4080786.20	0.01120
245374.30	4080786.20	0.01386	245399.30	4080786.20	0.01749
245424.30	4080786.20	0.02261	245449.30	4080786.20	0.02998
245474.30	4080786.20	0.04103	245499.30	4080786.20	0.05904
245299.30	4080811.20	0.00811	245324.30	4080811.20	0.00967
245349.30	4080811.20	0.01168	245374.30	4080811.20	0.01431
245399.30	4080811.20	0.01778	245424.30	4080811.20	0.02242
245449.30	4080811.20	0.02867	245474.30	4080811.20	0.03715
245499.30	4080811.20	0.04842	245299.30	4080836.20	0.00838
245324.30	4080836.20	0.00991	245349.30	4080836.20	0.01183

245374.30	4080836.20	0.01424	245399.30	4080836.20	0.01725
245424.30	4080836.20	0.02095	245449.30	4080836.20	0.02541
245474.30	4080836.20	0.03056	245499.30	4080836.20	0.03603
245324.30	4080861.20	0.00990	245349.30	4080861.20	0.01159
245374.30	4080861.20	0.01361	245399.30	4080861.20	0.01590
245424.30	4080861.20	0.01845	245449.30	4080861.20	0.02114
245474.30	4080861.20	0.02382	245499.30	4080861.20	0.02621
245299.30	4080886.20	0.00839	245324.30	4080886.20	0.00960
245349.30	4080886.20	0.01097	245374.30	4080886.20	0.01245
245399.30	4080886.20	0.01399	245424.30	4080886.20	0.01552
245449.30	4080886.20	0.01698	245474.30	4080886.20	0.01828
245499.30	4080886.20	0.01926	245299.30	4080911.20	0.00805
245324.30	4080911.20	0.00901	245349.30	4080911.20	0.00999
245374.30	4080911.20	0.01097	245399.30	4080911.20	0.01189
245424.30	4080911.20	0.01274	245449.30	4080911.20	0.01350
245474.30	4080911.20	0.01412	245499.30	4080911.20	0.01449
245299.30	4080936.20	0.00751	245324.30	4080936.20	0.00819
245349.30	4080936.20	0.00883	245374.30	4080936.20	0.00941
245399.30	4080936.20	0.00993	245424.30	4080936.20	0.01038
245449.30	4080936.20	0.01078	245474.30	4080936.20	0.01108
245499.30	4080936.20	0.01120	245499.30	4080961.20	0.00888
245564.60	4080447.70	0.00232	245589.60	4080447.70	0.00261
245614.60	4080447.70	0.00296	245639.60	4080447.70	0.00340

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): JOO601AS ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
245664.60	4080447.70	0.00397	245689.60	4080447.70	0.00466
245714.60	4080447.70	0.00543	245739.60	4080447.70	0.00619

245564.60	4080472.70	0.00283	245589.60	4080472.70	0.00324
245614.60	4080472.70	0.00377	245639.60	4080472.70	0.00445
245664.60	4080472.70	0.00531	245689.60	4080472.70	0.00632
245714.60	4080472.70	0.00737	245739.60	4080472.70	0.00830
245764.60	4080472.70	0.00897	245789.60	4080472.70	0.00928
245564.60	4080497.70	0.00355	245589.60	4080497.70	0.00416
245614.60	4080497.70	0.00498	245639.60	4080497.70	0.00607
245664.60	4080497.70	0.00742	245689.60	4080497.70	0.00890
245714.60	4080497.70	0.01027	245739.60	4080497.70	0.01130
245764.60	4080497.70	0.01180	245789.60	4080497.70	0.01175
245564.60	4080522.70	0.00461	245589.60	4080522.70	0.00556
245614.60	4080522.70	0.00694	245639.60	4080522.70	0.00877
245664.60	4080522.70	0.01091	245689.60	4080522.70	0.01302
245714.60	4080522.70	0.01467	245739.60	4080522.70	0.01551
245764.60	4080522.70	0.01546	245789.60	4080522.70	0.01470
245564.60	4080547.70	0.00629	245589.60	4080547.70	0.00789
245614.60	4080547.70	0.01038	245639.60	4080547.70	0.01362
245664.60	4080547.70	0.01701	245689.60	4080547.70	0.01981
245714.60	4080547.70	0.02133	245739.60	4080547.70	0.02129
245764.60	4080547.70	0.01998	245789.60	4080547.70	0.01799
245564.60	4080572.70	0.00922	245589.60	4080572.70	0.01231
245614.60	4080572.70	0.01726	245639.60	4080572.70	0.02311
245664.60	4080572.70	0.02822	245689.60	4080572.70	0.03127
245714.60	4080572.70	0.03128	245739.60	4080572.70	0.02876
245764.60	4080572.70	0.02507	245789.60	4080572.70	0.02124
245221.90	4080419.40	0.00129	245246.90	4080419.40	0.00131
245271.90	4080419.40	0.00132	245221.90	4080444.40	0.00147
245246.90	4080444.40	0.00150	245271.90	4080444.40	0.00153
245296.90	4080444.40	0.00156	245321.90	4080444.40	0.00157
245221.90	4080469.40	0.00167	245246.90	4080469.40	0.00173
245271.90	4080469.40	0.00178	245296.90	4080469.40	0.00182
245321.90	4080469.40	0.00187	245346.90	4080469.40	0.00190
245371.90	4080469.40	0.00191	245396.90	4080469.40	0.00192
245421.90	4080469.40	0.00193	245221.90	4080494.40	0.00190
245246.90	4080494.40	0.00198	245271.90	4080494.40	0.00206

245296.90	4080494.40	0.00214	245321.90	4080494.40	0.00221
245346.90	4080494.40	0.00228	245371.90	4080494.40	0.00233
245396.90	4080494.40	0.00237	245421.90	4080494.40	0.00240

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): JOO601AS ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
245446.90	4080494.40	0.00242	245471.90	4080494.40	0.00247
245496.90	4080494.40	0.00258	245521.90	4080494.40	0.00279
245221.90	4080519.40	0.00213	245246.90	4080519.40	0.00225
245271.90	4080519.40	0.00237	245296.90	4080519.40	0.00250
245321.90	4080519.40	0.00262	245346.90	4080519.40	0.00274
245371.90	4080519.40	0.00285	245396.90	4080519.40	0.00295
245421.90	4080519.40	0.00302	245446.90	4080519.40	0.00308
245471.90	4080519.40	0.00315	245496.90	4080519.40	0.00328
245521.90	4080519.40	0.00355	245221.90	4080544.40	0.00237
245246.90	4080544.40	0.00253	245271.90	4080544.40	0.00271
245296.90	4080544.40	0.00289	245321.90	4080544.40	0.00308
245346.90	4080544.40	0.00328	245371.90	4080544.40	0.00349
245396.90	4080544.40	0.00368	245421.90	4080544.40	0.00385
245446.90	4080544.40	0.00401	245471.90	4080544.40	0.00415
245496.90	4080544.40	0.00434	245521.90	4080544.40	0.00470
245221.90	4080569.40	0.00261	245246.90	4080569.40	0.00283
245271.90	4080569.40	0.00306	245296.90	4080569.40	0.00332
245321.90	4080569.40	0.00360	245346.90	4080569.40	0.00391
245371.90	4080569.40	0.00424	245396.90	4080569.40	0.00458
245421.90	4080569.40	0.00493	245446.90	4080569.40	0.00528
245471.90	4080569.40	0.00563	245496.90	4080569.40	0.00601
245521.90	4080569.40	0.00657			

*** THE SUMMARY OF MAXIMUM ANNUAL RESULTS AVERAGED OVER 5 YEARS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

NETWORK GROUP ID GRID-ID		AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	OF TYPE
ALL	1ST HIGHEST VALUE IS	0.11757 AT	(245689.90, 4080671.20, 99.06, 99.06, 0.00)	DC
	2ND HIGHEST VALUE IS	0.11503 AT	(245689.90, 4080696.20, 99.06, 99.06, 0.00)	DC
	3RD HIGHEST VALUE IS	0.10227 AT	(245689.90, 4080721.20, 99.11, 99.11, 0.00)	DC
	4TH HIGHEST VALUE IS	0.07687 AT	(245689.90, 4080746.20, 99.22, 99.22, 0.00)	DC
	5TH HIGHEST VALUE IS	0.07252 AT	(245714.90, 4080671.20, 99.06, 99.06, 0.00)	DC
	6TH HIGHEST VALUE IS	0.06783 AT	(245714.90, 4080696.20, 99.10, 99.10, 0.00)	DC
	7TH HIGHEST VALUE IS	0.05904 AT	(245499.30, 4080786.20, 98.90, 98.90, 0.00)	DC
	8TH HIGHEST VALUE IS	0.05707 AT	(245714.90, 4080721.20, 99.22, 99.22, 0.00)	DC
	9TH HIGHEST VALUE IS	0.04842 AT	(245499.30, 4080811.20, 98.77, 98.77, 0.00)	DC
	10TH HIGHEST VALUE IS	0.04710 AT	(245739.90, 4080671.20, 99.06, 99.06, 0.00)	DC

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR

*** Message Summary : AERMOD Model Execution ***

--------- Summary of Total Messages --------

A Total of 0 Fatal Error Message(s)
A Total of 6 Warning Message(s)
A Total of 1361 Informational Message(s)

A Total of 43824 Hours Were Processed

A Total of 750 Calm Hours Identified

A Total of 611 Missing Hours Identified (1.39 Percent)

```
******** FATAL ERROR MESSAGES ********
           ***  NONE  ***


********   WARNING MESSAGES   ********
ME W186     606       MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used          0.50
ME W187     606       MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET
OU W565     610       PERPLT: Possible Conflict With Dynamically Allocated FUNIT     PLOTFILE
OU W565     611       PERPST: Possible Conflict With Dynamically Allocated FUNIT     POSTFILE
MX W420    7582        METQA: Wind Speed Out-of-Range.   KURDAT =                    18111222
MX W420    7588        METQA: Wind Speed Out-of-Range.   KURDAT =                    18111304

************************************
*** AERMOD Finishes Successfully ***
************************************
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Risk Calculations For Diesel Exhaust

$Risk_{inh-res} = Dose_{air} * CPF * ASF * ED/AT$

$Dose_{air} = C_{air} * (BR/BW) * A * EF * 10^{-6}$

Variable	Description	Units	Value
$Risk_{inh-air}$	Residential inhalation cancer risk	Unitless	Calculated
$Dose_{air}$	Daily inhalation dose	mg/kg-day	Calculated
CPF	Inhalation cancer potency factor	$(mg/kg\text{-}day)^{-1}$	Chemical Specific
ASF	Age sensitivity factor for a specified age group	Unitless	Calculated
ED	Exposure duration (in years) for a specified age group	years	Calculated
AT	Averaging time for lifetime caner risk	years	70
FAH	Fraction of time spent at home	Unitless	Calculated

Variable	Description	Units	Value	
$Dose_{air}$	Daily inhalation dose	mg/kg-day	Calculated	
C_{air}	Concentration in air	ug/m^3	**0.121**	1.21E-01
(BR/BW)	Daily Breathing rate normalized to body weight	L/kg body weight-day	Calculated	
A	Inhalation absorption fraction	Unitless	1	
EF	Exposure frequency (days/365 days)	Unitless	Calculated	
10^{-6}	migrograms to milligrams conversion, liters to cubic meters conversion	Unitless	Calculated	

0.00E+00

Residential Exposures

Age Group	Risk	Age Sensitivity	FAH	ED	CPF	Dose Air	Cair	BR/BW	A	EF
3rd Trimester	0.00E+00	10	1	0	1.1	4.19E-05	0.121	361	1	0.958904
0-1	2.05E-05	10	1	1.03	1.1	1.26E-04	0.121	1090	1	0.958904
1-2	0.00E+00	10	1	0	1.1	1.26E-04	0.121	1090	1	0.958904
2-3	0.00E+00	3	1	0	1.1	6.64E-05	0.121	572	1	0.958904
3-4	0.00E+00	3	1	0	1.1	6.64E-05	0.121	572	1	0.958904
2<9	0.00E+00	3	0.72	0	1.1	9.99E-05	0.121	861	1	0.958904
2<16	0.00E+00	3	0.72	0	1.1	8.64E-05	0.121	745	1	0.958904
16<30	4.59E-07	1	0.73	1.03	1.1	3.89E-05	0.121	335	1	0.958904
16-70	0.00E+00	1	0.73	0	1.1	3.36E-05	0.121	290	1	0.958904

3rd trimeseter to 4.	2.05E-05
3rd trimester to 30	0.00E+00
3rd trimester to 70	**2.09E-05**

Risk Calculations For Diesel Exhaust

$Risk_{inh-res} = Dose_{air} * CPF * ASF * ED/AT$

$Dose_{air} = C_{air} * (BR/BW) * A * EF * 10^{-6}$

Variable	Description	Units	Value
$Risk_{inh-air}$	Residential inhalation cancer risk	Unitless	Calculated
$Dose_{air}$	Daily inhalation dose	mg/kg-day	Calculated
CPF	Inhalation cancer potency factor	$(mg/kg\text{-}day)^{-1}$	Chemical Specific
ASF	Age sensitivity factor for a specified age group	Unitless	Calculated
ED	Exposure duration (in years) for a specified age group	years	Calculated
AT	Averaging time for lifetime caner risk	years	70
FAH	Fraction of time spent at home	Unitless	Calculated

Variable	Description	Units	Value	
$Dose_{air}$	Daily inhalation dose	mg/kg-day	Calculated	
C_{air}	Concentration in air	ug/m^3	**0.127**	1.27E-01
(BR/BW)	Daily Breathing rate normalized to body weight	L/kg body weight-day	Calculated	
A	Inhalation absorption fraction	Unitless	1	
EF	Exposure frequency (days/365 days)	Unitless	Calculated	
10^{-6}	migrograms to milligrams conversion, liters to cubic meters conversion	Unitless	Calculated	

0.00E+00

Residential Exposures

Age Group	Risk	Age Sensitivity	FAH	ED	CPF	Dose Air	Cair	BR/BW	A	EF
3rd Trimester	0.00E+00	10	1	0	1.1	4.40E-05	0.127	361	1	0.958904
0-1	2.15E-05	10	1	1.03	1.1	1.33E-04	0.127	1090	1	0.958904
1-2	0.00E+00	10	1	0	1.1	1.33E-04	0.127	1090	1	0.958904
2-3	0.00E+00	3	1	0	1.1	6.97E-05	0.127	572	1	0.958904
3-4	0.00E+00	3	1	0	1.1	6.97E-05	0.127	572	1	0.958904
2<9	0.00E+00	3	0.72	0	1.1	1.05E-04	0.127	861	1	0.958904
2<16	0.00E+00	3	0.72	0	1.1	9.07E-05	0.127	745	1	0.958904
16<30	4.82E-07	1	0.73	1.03	1.1	4.08E-05	0.127	335	1	0.958904
16-70	0.00E+00	1	0.73	0	1.1	3.53E-05	0.127	290	1	0.958904

3rd trimeseter to 4.	2.15E-05
3rd trimester to 30	0.00E+00
3rd trimester to 70	**2.20E-05**

EXHIBIT B

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION

CALIFORNIA
WASHINGTON
NEW YORK

23 July 2024

Christopher A. Brown, Director
Fennemore Law
8080 N. Palm Avenue, Third Floor
Fresno, California 93711

Subject: *Lincoln Park Apartments, 7056 North Prospect Avenue, Fresno, California*
City of Fresno Permit Application P21-00989
Review of Categorical Exemption Environmental Assessment – Noise

Dear Mr. Brown:

I have reviewed documents pertaining to the Categorical Exemption of the subject project, in particular the document identified as Exhibit J on the City of Fresno's Legislation website page that pertains to this project:[1]

> *City of Fresno Categorical Exemption*
> *Environmental Assessment for Development Permit Application No. P21-00989*
> *("Environmental Assessment")*

This letter presents our comments on Noise section of this document.

Wilson Ihrig, Acoustical Consultants, has practiced exclusively in the field of acoustics since 1966. During our 58 years of operation, we have prepared hundreds of noise studies for Environmental Impact Reports and Statements. We have one of the largest technical laboratories in the acoustical consulting industry. We also regularly utilize industry-standard acoustical programs such as Environmental Noise Model (ENM), Traffic Noise Model (TNM), SoundPLAN, and CADNA. In short, we are well qualified to prepare environmental noise studies and review studies prepared by others.

Comments Regarding Construction Noise

The Environmental Assessment takes the position that because the Fresno municipal code exempts construction noise during specified time periods from the quantitative noise standards that otherwise apply, construction noise from the project will technically comply with the local

[1] City of Fresno - File #: ID 24-651 (legistar.com)

standards and, therefore, is incapable of causing any sort of environmental impact. The fallacy of this argument is plain when one considers that it would allow noise levels that could cause hearing loss and still lead to the conclusion that those levels do not cause a significant environmental noise impact. CEQA is not focused on the application of local regulations. Rather, it is focused on the determination of actual environmental degradation and disclosure of any degradation that is reasonably found to cause a significant impact on the environment. While the CEQA Appendix G guidelines for noise assessment do call for comparison of project noise levels to local standards, they also call for comparison to the existing ambient, specifically stating:

> Would the project result in . . . [g]eneration of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project . . .

This aspect of a thorough CEQA noise assessment is completely disregarded in the Environmental Assessment document.

An assessment based on the existing ambient is all the more important in this situation because the Fresno noise ordinance's *prima facia* noise limit is itself based on the ambient noise level:

> Any noise or sound exceeding the ambient noise level at the property line of any person offended thereby, or, if a condominium or apartment house, within any adjoining living unit, by more than five decibels shall be deemed to be prima facie evidence of a violation of Section 8-305. [F.M.C. Sec. 10-106. PRIMA FACIE VIOLATION]

In this situation, comparison with the existing ambient must necessarily be the basis for a CEQA assessment.

There is nothing in the record for this project that suggests that ambient measurements have been made in the surrounding neighborhoods. However, the Fresno Noise Ordinance contains statutory minimum ambient noise levels for various zoning districts, and given a lack of any other information, it is reasonable to assume these for the areas surrounding the project site. For residential districts, these statutory ambient levels are:

7:00 am to 7:00 pm	60 dBA
7:00 pm to 10:00 pm	55 dBA

Construction is a noisy endeavor. The Environmental Protection Agency (EPA) has published typical ranges of noise levels at construction sites for a variety of building types.[2] For domestic housing, the EPA noise levels for each major phase of construction with all pertinent equipment present at site are reproduced in Table I.

[2] *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances*, U. S. Environmental Protection Agency, NTID300.1, 31 December 1971.

TABLE I EPA NOISE LEVELS FOR RESIDENTIAL CONSTRUCTION

Phase	Average	Range‡
Ground clearing	83 dBA	75 to 91 dBA
Excavation	88	80 to 96
Foundations	81	71 to 91
Erection	81	71 to 91
Finishing	88	81 to 95

‡ The range is the average plus/minus one standard deviation. For a "normal" (bell-shaped) distribution, the noise level will be within the range 68% of the time and higher than the low end of the range 84% of the time.

The values given in Table I are based on the loudest piece of equipment being located at a distance of 50 feet. Construction equipment noise spreads as a point source (as opposed to roadway noise which is a line source), and point source noise attenuates at a rate of 6 decibels per every doubling of distance (which means it also increases 6 dB for every halving of distance). So, for example, if the noise is 88 dBA at 50 feet, it will be 82 dBA at 100 feet and 76 dBA at 200 feet. The noise level does not attenuate linearly with distance because the decibel scale is logarithmic (like the Richter scale for earthquakes).

According to F.M.C. Sec. 10-106, the *prima facia* noise limit for most noises is 5 dB over the ambient. Using the statutory daytime (7:00 am – 7:00 pm) ambient of 60 dBA, the *prima facia* limit is 65 dBA. However, as noted above, construction noise levels are exempted by the F.M.C. from the normal *prima facia* noise limit, so what is a reasonable threshold of significance? I believe a reasonable limit is the *prima facia* limit plus another 5 dB., i.e., the ambient plus 10 dB. Given the statutory ambient, this is 70 dBA between 7:00 am and 7:00 pm.

Returning to Table I, one can see that not only is the average noise level for every construction phase well over 70 dBA, the lower end of the expected range is also over 70 dBA for every phase. This is direct evidence that unmitigated construction noise will cause a significant impact on residents immediately adjacent to the project site (namely, residents of the 11 homes between 7003 and 7063 Harmony Drive, inclusive).

Another way to look at this is to consider how far away the construction will have to be for the noise level to drop to 70 dBA. If the noise level at 50 feet is 88 dBA, the construction would have to be 400 feet away for the level to attenuate to 70 dBA. However, the width of the site from east to west is only 350 feet. So, if the average construction noise level is 88 dBA at 50 feet, it will be greater than 70 dBA for the entire period of the phase.[3] Focusing on the first four phases of construction, Table II shows the percentage of the 350-foot wide site for which the noise level will be greater than 70 dBA.

[3] This is strictly true for the Ground Clearing, Excavation, and Foundation phases. Potentially less so for the Erection phase if some built portions block noise from other portions being built. For the Finishing phase the noise levels would only match the levels shown in Table I for areas that have a direct line of sight to the off-site receptor.

TABLE II PERCENT OF SITE ON WHICH NOISE WILL EXCEED 70 dBA

Phase	Average	Range
Ground clearing	64%	25% to 100%
Excavation	100%	45% to 100%
Foundations	51%	16% to 100%
Erection	51%	16% to 100%

For each of the first four phases of construction, the noise level is expected to exceed 70 dBA for more than 50% of the site. This indicates the longevity of time that residences of Harmony Drive will be subjected to construction noise levels at least 10 dB higher than the statutory ambient and 5 dB higher than the *prima facia* noise limit established by the F.M.C.

Concluding Comments

The Environmental Assessment upon which the Categorical Exemption for this project is based concludes that there will not be a temporary noise impact based on a legal technicality, disregarding the intent and spirit of CEQA. Using construction noise level estimates published by the EPA, an ambient noise level based on the Fresno municipal code, and a reasonable threshold of significance also founded upon the municipal code, I have demonstrated by simple analysis that, in fact, the residents of Harmony Drive will be likely be subjected to a temporary, significant noise impact by the construction of the Lincoln Park Apartments project.

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Please let me know if you have any questions about these comments on Lincoln Park Apartments environmental noise assessment that was produced to support a Categorical Exemption for the project.

Very truly yours,

WILSON IHRIG

Derek L. Watry
Principal