



Letter #	Organization	Date
1	Caltrans	April 9, 2025
2	California Air Resources Board	April 28, 2025
3	California Department of Toxic Substances Control	April 24, 2025
4	Fresno Metropolitan Flood Control District	April 28, 2025
5	Fresno Naturalist	April 27, 2025
6	San Joaquin Valley Air Pollution Control District	April 24, 2025

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please contact the Planning Department at (559) 621-8277*

California Department of Transportation

DISTRICT 6 OFFICE

1352 WEST OLIVE AVENUE | P.O. BOX 12616 | FRESNO, CA 93778-2616
(559) 981-7284 | FAX (559) 488-4195 | TTY 711

www.dot.ca.gov



April 9, 2025

FRE-99

West Area Neighborhoods Specific Plan

Re-circulated Draft EIR

GTS #: <https://ld-igr-gts.dot.ca.gov/district/6/report/23472>

SENT VIA EMAIL

Casey Lauderdale, Planner
City of Fresno Long Range Planning Division
casey.lauderdale@fresno.gov

Dear Mx. Lauderdale,

Thank you for the opportunity to review the re-circulated draft Environmental Impact Report (EIR) for the West Area Neighborhoods Specific Plan. Caltrans has completed its review of the plan which encompasses approximately 7,077 acres in the City of Fresno city limits and unincorporated Fresno County. The Plan includes future development of up to 54,953 dwelling units and 60,621,006 square feet of non-residential uses.

The Plan Area is triangular in shape and located west of State Route 99. It is bounded on the south by West Clinton Avenue, and to the west by Grantland and Garfield Avenues. The Plan area includes the southwest portion of Highway City adjacent to State Route (SR) 99.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) process reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

Caltrans provides the following comments consistent with the State's smart mobility goals that support a vibrant economy and sustainable communities:

Caltrans District 6 has completed its review of the West Area Neighborhoods Specific Plan Recirculated Draft Environmental Impact Report (EIR). Chapter 2.0 of the Recirculated Draft EIR, dated June 2022, provided responses to the Caltrans

comment letter sent March 18, 2022. The responses are acceptable. No further comment on the documents provided in this LDR GTS circulation.

If you have any other questions, please call or email: Keyomi Jones, Associate Transportation Planner at (559) 981-7284 or keyomi.jones@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dave Padilla", with a stylized flourish at the end.

Mr. Dave Padilla, Branch Chief,
Local Development Review Branch

April 28, 2025

Casey Lauderdale, Supervising Planner
City of Fresno Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, California 93721

Dear Ms. Lauderdale:

I am writing to provide comments on the Recirculated Draft Environmental Impact Report (draft EIR) for the Proposed West Area Neighborhoods Specific Plan Project (Project) under consideration by the City of Fresno (City). The California Air Resources Board (CARB) works to support the State's long-term climate goals by engaging with local jurisdictions and lead agencies as they evaluate the greenhouse gas (GHG), air quality, and vehicle miles traveled (VMT) impacts of new development during the California Environmental Quality Act (CEQA) process.

Specifically, CARB has an interest in encouraging new residential and mixed-use development to demonstrate consistency with the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan).¹ As noted in Appendix D, Local Actions, of the 2022 Scoping Plan (Appendix D), "[l]ocal government efforts to reduce greenhouse gas (GHG) emissions within their jurisdiction are critical to achieving the State's long-term climate goals."

Appendix D of the Scoping Plan provides guidance to local lead agencies on how to analyze residential and mixed-use projects for consistency with the State's climate goals. One of the recommended consistency pathways in Appendix D is for projects to incorporate "Key Residential and Mixed-Use Project Attributes that Reduce GHGs," included in Table 3.

The measures recommended in this table reduce a project's operational GHG emissions, as supported by the academic literature. For projects that do not wish to use the recommendations in Table 3, Appendix D provides other recommendations for how to align residential and mixed-use projects with the State's climate goals. For example, projects can determine that they are consistent with the Scoping Plan if they demonstrate that they will result in net-zero GHG emissions or employ a threshold of significance that is aligned with the state's climate goals and supported by substantial evidence.

The draft EIR for the Project determines that "the Project would be considered consistent with the 2022 Scoping Plan." However, CARB observes that the analysis contained in the draft EIR does not support a determination that the Project is consistent with the state's climate goals, as defined in the Scoping Plan.

¹ [2022 Scoping Plan / California Air Resources Board](#)

In addition, the draft EIR does not include a Project alternative that would meet its objectives while reducing GHG emissions and VMT.

CARB recommends that the Project explore additional opportunities to align with the Scoping Plan's recommendations and further reduce GHG and VMT. CARB provides its specific recommendations below.

The Project will have significant GHG and VMT impacts.

As noted above, Table 3 of Appendix D of the Scoping Plan lists recommended attributes for residential and mixed-use projects that demonstrate consistency with the Scoping Plan. CARB observes that the Project does not incorporate many of these recommended attributes, which could result in GHG and VMT increases that are not aligned with State climate goals.

The Project should consider meaningful alternatives that would reduce or avoid the Project's GHG and VMT impacts.

The Draft EIR does not include one or more Project alternatives that would meet its objectives while reducing GHG emissions and VMT. The draft EIR only evaluates options that guide residential and commercial development outwards to undeveloped portions of the city and county.

A meaningful analysis of alternatives that reduce GHG emissions and VMT from the baseline scenario and the Project would include an alternative that orients growth towards infill areas, downtown Fresno, neighborhood centers, and the High-Speed Rail station currently under construction. Such an alternative would better align with the Scoping Plan's recommendations, and it could provide a range of housing and commercial development options that would utilize the city's existing infrastructure.

The Project should consider providing EV charging infrastructure meeting the most ambitious voluntary standard in the California Green Building Standards Code for single-family, multi-family, and commercial uses.

California has established a target for zero-emission vehicles (ZEVs) to make up 100% of new car and light truck sales by 2035. To accommodate this, California will need robust infrastructure to support ZEV use. Table 3 of Appendix D recommends that electric vehicle (EV) charging infrastructure be provided that meets the most ambitious voluntary standard in the California Green (CalGreen) Building Standards Code at the time of project approval, which is Tier 2.

Table 3.7-5 of the draft EIR evaluates the Project's consistency with the 2022 Scoping Plan. The table finds that the Project will include an electric vehicle parking requirement and will provide EV spaces consistent with the requirements of the CalGreen Code. For the Project to be fully consistent with the EV charging infrastructure project attribute from Table 3 of Appendix D, the Project would need to commit to achieving Tier 2 CalGreen standards for single-family, multi-family, and commercial uses throughout the Project. This would assist

Project residents and those employed within the Project as they transition from conventional vehicles to ZEVs and would avoid future, higher costs to build infrastructure later.

The Project should consider implementing more substantial measures to mitigate VMT and GHG emissions resulting from its exurban location.

Appendix D of the Scoping Plan identifies, as an attribute for residential and mixed-use projects, a location on an infill site that is surrounded by existing urban development. The Project site is partially within the limits of the City of Fresno, with the remainder of the site consisting of land within the jurisdiction of the County of Fresno that will be annexed into the City. The site is located to the northwest of the existing urbanized Fresno.

The Project site consists almost exclusively of low-density residential and agricultural uses, with utilities and public services consistent with those uses. Approximately 20 percent of the site is vacant land, and there is a limited amount of commercial development in the eastern and southeastern portions of the Project site, closer to Highway 99. While urban development exists to the north and east of the Project site, farmland and rural residential uses dominate to the west and much of the south.

Therefore, the Project is not located on an “infill” site, and CARB recommends that the draft EIR fully consider the GHG and VMT impacts of developing in a location that is not surrounded by existing urban uses. The Transportation and Circulation section of the draft EIR states that the per capita VMT for the Specific Plan area at buildout would be 39% less than the countywide average. However, it is not clear how this number is derived. Table 3.7-5 of the draft EIR indicates that the Project is consistent with the VMT reduction goals included in the Scoping Plan because it will implement pedestrian network improvements and traffic calming measures.

However, the VMT reduction goals described in Appendix D of the Scoping Plan focus on policies aimed at orienting growth toward infill areas and promoting non-automobile transportation alternatives such as transit, walking, and bicycling. While pedestrian network improvements and traffic calming measures are laudable, they do not make large-scale greenfield projects consistent with the Scoping Plan if they are disconnected from broader regional efforts to reduce VMT.

Table 3.7-5 also notes that large employers (greater than 100 employees) within the plan area will implement feasible Transportation Demand Management (TDM) strategies to decrease daily commute trips. Since the Project would consist mostly of residential uses with limited commercial or office space, most residents would be employed outside of the Project boundaries. Consequently, any TDM strategies instituted by larger employers are unlikely to substantially reduce commute trips generated by the residents of the Project, and it is not apparent that TDM strategies alone would suffice to reduce project VMT to 39% less than the countywide average.

The merits of TDM efforts notwithstanding, the Project remains fundamentally different from an infill project, and the pedestrian and traffic-calming measures, along with the

implementation of TDM strategies, are unlikely to address the potential GHG impacts of the Project. CARB staff recommends that the draft EIR analyze and consider how impacts related to developing a large site that is not surrounded by existing urban development can be mitigated to the extent feasible. These impacts could include significant increases in regional VMT, loss of natural and working lands, and the need to build new infrastructure, including roads and utilities.

The Project should consider implementing more substantial measures to mitigate the resulting loss in natural and working lands.

Over ten percent of the Project site is open space or agricultural land. For a project to be consistent with Table 3 of Appendix D of the CARB 2022 Scoping Plan, it should “not result in the loss or conversion of natural and working lands.” Since the Project would convert land currently used for agricultural purposes, the Project would not meet this project attribute listed in Appendix D.

The Project identifies the conversion of important farmland to non-agricultural land uses as a significant and unavoidable impact, even after the implementation of Mitigation Measure 3.2-1. CARB staff recommend that the Project ensure that it is implementing all feasible measures to adequately mitigate the GHG impacts associated with the conversion of farmland into the urban uses contemplated by the Project.

The Project should consider shuttle and micro-transit service since densities are not transit-supportive and the Project is not in proximity to existing transit stops.

Appendix D of the Scoping Plan specifies that a project with transit-supportive densities will have a minimum of 20 residential dwelling units per acre. This helps new development to be supportive of any transit that is provided to the Project site in the future.

Alternatively, Appendix D recommends that new development be within ½ mile of existing transit. Portions of the Project site are currently served by several transit (e.g., Fresno Area Express (FAX)) routes. While these existing routes will benefit part of the Project area, much of the Project’s residential development will be more than half a mile away from any existing transit options.

The three existing FAX routes that serve the Project site leave large parts of the south, west, and north of the site without convenient transit access. All of these portions of the site are planned for substantial residential development. It is unclear from the draft EIR whether FAX plans to provide additional transit routes to service the Project area in the future. CARB encourages efforts to provide transit options for the residents and employees of the Project.

However, until convenient and permanent FAX transit becomes available throughout the Project area, the Project should consider providing other transit options to the Project site. Options for connecting residents to destinations within the City of Fresno and the greater Fresno region can include shuttles, micro-transit, and micromobility services.

The Project includes various residential land use categories, but it is primarily made up of medium-low density and medium density residential. These categories would allow between 3.5 units per acre and 16 units per acre. Consequently, the Project would have a lower average residential density than the 20 residential dwelling units per acre recommended in Appendix D as transit-supportive. Devoting more of the residential portions of the Project site to higher-density residential would allow the Project to increase the likelihood of effective transit service in the future.²

The Project can incorporate reduced parking requirements.

Another recommendation in Appendix D of the Scoping Plan for achieving reductions in VMT is reduced parking availability in residential development. As identified by the California Air Pollution Control Officers Association,³ lower parking ratios can encourage residents to utilize non-motorized modes of travel. As described in the Transportation and Circulation section of the draft EIR, mitigation measure 3.14, large employers within the plan area will implement a number of Transportation Demand Management Strategies, some of which aim at reducing the availability of parking at workplaces. CARB encourages the City to consider implementing parking reductions at residential uses. Reducing residential parking ratios can be an effective way to further reduce VMT by encouraging non-motorized travel.

As emphasized in Appendix D, for multi-family units, the cost of parking can be unbundled from other unit rental costs, providing cost savings for those who do not use parking that can then help fund their use of alternative modes of transportation. As noted above, providing transit options such as bus service, shuttle service, and microtransit, or replacing automobile parking with bike parking or secure bike storage options, could also reduce the need for parking within the Project site.

The Project should consider a commitment to install all-electric appliances.

Building decarbonization is addressed in Appendix D of the Scoping Plan as a priority area for GHG reductions in California. Table 3 of Appendix D recommends the use of all-electric appliances for new residential and mixed-use development that elects the “project attributes” based approach for demonstrating consistency with the Scoping Plan. Table 3.7-5 of the draft EIR addresses building decarbonization and states that the Project would be consistent with applicable Title 24 Building Envelope Energy Efficiency Standards.

However, the impact analysis in the Greenhouse Gases, Climate Change and Energy section of the draft EIR states that both electricity and natural gas will be used during Project operations, with annual natural gas consumption by the Project estimated at 1,002,916,851

² Table 3 of Appendix D of the Scoping Plan notes that a project may also demonstrate consistency in this area by satisfying more detailed criteria as specified in the applicable SCS, if the criteria is more stringent than the recommendations included in Table 3. Since the Project does not meet the criteria listed in Table 3, CARB did not assess whether it complies with any SCS criteria that may be more stringent.

³ <https://caleemod.com/handbook/index.html>

kilo-British Thermal Units (kBTUs) by 2035. Consequently, the Project is not consistent with Appendix D's recommendation for the use of all-electric appliances.

Project attribute comparison table

The table below summarizes the comments above and compares the Project to the recommended project attributes in Table 3 of Appendix D of the Scoping Plan:

Table 1. Appendix D Project Attributes Comparison Table

Project Attributes from Scoping Plan Appendix D, Table 3	West Area Neighborhoods Specific Plan Project
Provides ZEV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.	Infrastructure will include an electric vehicle parking requirement and will provide EV spaces consistent with the requirements of the CalGreen Building Standards Code, but will not implement the most ambitious voluntary standard in the California Green Building Standards Code.
Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)	The Project will develop land that is not surrounded by existing development.
Does not result in loss or conversion of natural or working lands	The Project will develop a site partially used for agricultural purposes, resulting in the loss of working agricultural lands.
Includes transit-supportive densities for new mixed-use or residential development, or ; Is in proximity to existing transit stops for new mixed-use or residential development; or ; Meets more stringent criteria as specified in the applicable SCS	The Project includes a variety of residential land uses but will be primarily medium and medium-low-density residential, resulting in densities that are not transit supportive. Limited transit options currently exist to serve the Project site. The Specific Plan does not provide for reduced parking ratios at residential uses.
Reduces parking requirements by:	Larger employers within the Project will implement some Transportation Demand Strategies that will reduce available parking.

• Eliminating parking requirements or including maximum allowable parking ratios; or • Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or • For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.	The Project will not include reduced parking requirements for residential uses.
At least 20 percent of the units included are affordable to lower-income residents	The Project will include affordable housing in line with the most recent Regional Housing Needs Assessment.
Results in no net loss of existing affordable units	The Project will not create a net loss of affordable housing.
Uses all electric appliances	The Project will utilize both electricity and natural gas for space heating, water heating, and cooking uses, with natural gas use estimated at 1,002,916,851 kilo-British Thermal Units (BTUs) of natural gas used by the Project each year.

CARB appreciates the opportunity to comment on the draft EIR for the Project. Given the breadth and scope of projects subject to CEQA review that have air quality and GHG impacts, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not submit comments.

Conclusion

CARB appreciates the opportunity to review and comment on the draft EIR for the City of Fresno's Proposed West Area Neighborhoods Specific Plan Project. CARB has identified certain aspects of the Project, as described in the draft EIR, that are not in full alignment with the State's climate goals. CARB provides its recommendations above regarding actions to assist in reducing the GHG impacts of the Project and help the Project better align with the State's climate goals. In addition, CARB would also recommend that the analysis include an alternative that orients the Project's growth towards infill areas, downtown Fresno, and neighborhood centers.

Thank you for considering these comments. CARB looks forward to working with the City of Fresno towards achieving healthy and sustainable growth that helps support California's

Casey Lauderdale, Supervising Planner
April 28, 2025
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climate goals. If you have any questions, please feel free to contact Pedro Peterson at (279) 208-7367 or by email at Pedro.Peterson@arb.ca.gov.

Sincerely,

Annalisa Schilla

Annalisa Schilla, Assistant Division Chief, Sustainable Transportation and Communities Division

Annalisa.Schilla@arb.ca.gov

cc: Chanell Fletcher, Deputy Executive Officer, California Air Resources Board
Chanell.Fletcher@arb.ca.gov

Jennifer Gress, Chief, Sustainable Transportation and Communities Division
Jennifer.Gress@arb.ca.gov

Pedro Peterson, Supervisor, Local Planning Section, STCD
Pedro.Peterson@arb.ca.gov



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

April 24, 2025

Casey Lauderdale
Supervising Planner
City of Fresno
2600 Fresno Street, Room 3065
Fresno, CA 93721
Casey.Lauderdale@Fresno.gov

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE WEST AREA
NEIGHBORHOODS SPECIFIC PLAN (FORMERLY SPECIFIC PLAN OF THE WEST
AREA) DATED MARCH 12, 2025, STATE CLEARINGHOUSE NUMBER [2019069117](#)

Dear Casey Lauderdale,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for The West Area Neighborhoods Specific Plan (formerly Specific Plan of the West Area) (Project). The proposed Project will establish the land use planning and regulatory guidance, including the land use and zoning designations and policies, for the approximately 7,077-acre Plan Area. The Project would allow for the future development of residential and non-residential uses. The proposed land use plan also designates public facility uses that are currently existing within the Plan Area, including schools and churches. Additionally, the proposed land use plan would allow for approximately 338.95 acres of park, open space, and ponding basin uses. The Project also includes circulation and utility improvements, some of which are planned in the City's current program for capital improvements.

In Section 3.8, Hazards and Hazardous Materials of the February 2022 DEIR, three sites ([West Shields Elementary School](#), [Golden State Ranch Property](#), and [Parc West Development](#)) are listed within the plan area. A fourth, [Diamond Cleaners](#), is listed as a dry cleaners from at least 1989 to 1996. The facility has potential hazardous materials and contamination on site.

The [West Shields Elementary School](#) and [Golden State Ranch Property](#) are school sites with statuses of No Further Action and No Action Required, respectively. The Parc West Development is not a DTSC site, but a project for which DTSC has previously provided comments in letters dated August 12, 2020 and March 28, 2022. DTSC believes that the Parc West Development was erroneously listed in place of the Westlake Proposed 430 Acre Development (Westlake), which is further discussed in the Hazards and Hazardous Materials section of the EIR.

[Westlake](#) is a DTSC Site with a terminated Voluntary Cleanup Agreement (VCA) and remains a potential concern. The [Phase 1 Environmental Site Assessment Update](#), Proposed Westlake Village, Shields, Grantland, & Garfield Avenues, Fresno, California 93723, prepared by Krazan & Associates, Inc., dated December 13, 2011, listed site development issues that included an approximately 10,000-gallon diesel fuel aboveground storage tank (AST), a liquid fertilizer AST, and two empty fertilizer ASTs. DTSC notes that residential development on the northern portion of the Westlake Site has already begun. This area was identified as Decision Unit Number 2 in the [Workplan for Preliminary Endangerment Assessment, Proposed Westlake Development, DTSC Docket HAS-VCA 13/14-072](#) prepared by Krazan & Associates, Inc., on February 19, 2014. The area was proposed to be assessed for Organochlorine Pesticides in addition to lead and Chlordane based on the past use as orchards and fallow agricultural land. The VCA was terminated prior to DTSC receiving any sampling results.

[Diamond Cleaners](#) is under active investigation by the DTSC Discovery and Enforcement Program (D&E). D&E cannot provide any further comments until further investigations are completed. Diamond Cleaners was identified in the Salem Engineering Group Inc. Phase I Environmental Site Assessment (ESA) Report in

Appendix I – EDR Radius Map Report, dated September 26, 2016, but was not identified as a recognized environmental condition (REC) in the Phase I ESA Report. The dry-cleaning operations handling chlorinated solvents, chemicals of concern, and the lack of soil and/or groundwater investigation information presents a REC and should be addressed and annotated as such.

DTSC recommends and requests consideration of the following comments:

1. DTSC recommends that any parties interested in further developing the Westlake Site enter a Standard Voluntary Agreement (SVA) (formally known as a VCA) to address contamination at brownfields and other types of properties or receive oversight from a [self-certified local agency](#) or Regional Water Quality Control Board. If entering into one of DTSC's voluntary agreements, please note that DTSC uses a single standard Request for Lead Agency Oversight Application for all agreement types. Please apply for DTSC oversight using this link: [Request for Agency Oversight Application](#). Submittal of the online application includes an agreement to pay costs incurred during agreement preparation. If you have any questions about the application portal, please contact your [Regional Brownfield Coordinator](#).
2. When agricultural crops and/or land uses are proposed or rezoned for residential use, a number of contaminants of concern (COCs) can be present. The Lead Agency shall identify the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are dichloro-diphenyl-trichloroethane, toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet [HHRA NOTE NUMBER 3, DTSC-SLs](#) approved local area baselines or thresholds. If they do not, remedial action must take place to mitigate them below those thresholds. Additional COCs may be found in mixing/loading/storage areas, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons may be required.

3. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment Guidance Manual](#).

Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

DTSC would like to thank you for the opportunity to comment on the DEIR for the West Area Neighborhoods Specific Plan Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our [CEQA Review email](#) for additional guidance.

Sincerely,



Dave Kereazis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Casey Lauderdale

April 24, 2025

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cc: (via email)

Governor's Office of Land Use and Climate Innovation

State Clearinghouse

State.Clearinghouse@opr.ca.gov

Elise Laws

Senior Planner

De Novo Planning Group

elaws@denovoplanning.com

Ryan Mitchum, PG

Engineering Geologist

SMRP – Santa Susana Field Lab - Clovis

Department of Toxic Substances Control

ryan.mitchum@dtsc.ca.gov

Patrick Fassell

Hazardous Substance Engineer

SMRP-Discovery & Enforcement

Department of Toxic Substances Control

patrick.fassell@dtsc.ca.gov

Elizabeth Tisdale

Engineering Geologist

SMRP – Northern California Schools Unit

Department of Toxic Substances Control

elizabeth.tisdale@dtsc.ca.gov

Tamara Purvis

Associate Environmental Planner

HWMP - Permitting Division – CEQA Unit

Department of Toxic Substances Control

Tamara.Purvis@dtsc.ca.gov

Scott Wiley

Associate Governmental Program Analyst

HWMP - Permitting Division – CEQA Unit

Department of Toxic Substances Control

Scott.Wiley@dtsc.ca.gov



Fresno Metropolitan Flood Control District

Capturing Stormwater since 1956

File 310. “AH”, “AI”, “AJ”,
“AK”, “AL”, “AN”, “CD”,
“CG”, “CH”, “CI”, “EO”,
“EJ”, “EM”, “EN”, “XX”
420.214

April 28, 2025

Casey Lauderdale, Planner
City of Fresno Planning & Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721

Dear Casey,

**Notice of Availability of a Recirculated Draft Environmental Impact Report (RDEIR)
for the West Area Neighborhoods Specific Plan
Drainage Areas “AH”, “AI”, “AJ”, “AK”, “AL”, “AN”,
“CD”, “CG”, “CH”, “CI”, “EO”, “EJ”, “EM”, “EN”, “XX”**

The Fresno Metropolitan Flood Control District (FMFCD) previously provided comments on the West Area Neighborhoods Specific Plan (Plan Area) in letters dated August 1, 2019, and March 30, 2022.

FMFCD bears responsibility for storm water management within the Fresno-Clovis metropolitan area, including the area of the Plan Area. The community has developed and adopted a Storm Drainage and Flood Control Master Plan. In general, each property contributes its pro-rata share to the cost of the public drainage system. All properties are required to participate in the community system for everyone. It is this form of participation in the cost and/or construction of the drainage system that will mitigate the impact of development. If there are to be storm water discharges from private facilities to FMFCD’s storm drainage system, they shall consist only of storm water runoff and shall be free of solids and debris. Landscape and/or area drains are not allowed to connect directly to FMFCD’s facilities.

The subject properties within the Plan Area shall pay drainage fees pursuant to the Drainage Fee Ordinance prior to approval of any final maps and/or issuance of building permits at the rates in effect at the time of such approval. Instances when the proposed density is reduced and the FMFCD Master Plan facilities have been constructed, the proposed development will be subject to the rate anticipated to be collected commensurate to the higher density.

k:\letters\environmental impact report letters\rdeir west area neighborhoods many drainage areas(dw).docx

Casey Lauderdale, Planner
City of Fresno Planning & Development Department
Notice of Availability of a Recirculated Draft Environmental Impact Report (RDEIR)
for the West Area Neighborhoods Specific Plan
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FMFCD has adopted storm drainage Master Plan systems for the areas located within the Plan Area based on the previously adopted General and Specific Plan land uses. FMFCD has reviewed the land use changes proposed by the Plan Area as shown on Figure 2.0-6 with regard to possible impacts on the planned and/or existing public drainage systems. It has been determined that the land use is either staying the same, increasing, or decreasing from what was originally planned.

In areas where storm drainage facilities have not yet been constructed, the FMFCD Master Plan may be revised to accommodate the proposed land uses within the Plan Area. In areas with existing storm drainage facilities, any proposed land use changes that would result in increased runoff beyond what was originally planned may require mitigation. Mitigation could include the installation of parallel pipes and/or on-site retention facilities to manage the additional flow. Properties within the Plan Area that may require such mitigation have been identified by FMFCD and are shown in the attached Exhibit No. 1.

FMFCD owns the ponding basin “CD” located on the southeast corner of Dakota Avenue and Garfield Avenue. FMFCD is currently working with the adjacent property owner to relocate the basin through a land exchange. The proposed land exchange will have the same foot-print as the existing basin but be flipped in a north-south direction in the current southeast location. The land exchange will comply with the California Environmental Quality Act to be completed by FMFCD.

Dual land use designations within the Plan Area exhibit significant variations in development density, which can have a direct impact on the sizing requirements of the FMFCD storm drainage facilities. In areas where dual designations exist, the intensity of land use may shift depending on future development patterns and jurisdictional decisions. To ensure adequate capacity and long-term functionality of the stormwater infrastructure, FMFCD will, for planning purposes, utilize the higher-density land use designation when designing its storm drainage facilities. This approach provides a conservative and proactive strategy that accommodates potential maximum runoff scenarios, thereby enhancing system reliability and reducing the need for future upgrades.

FMFCD offers the following comments specific to the review of the Plan Area (the individual pages are included and the section or sentence has been highlighted for your reference):

1. Figures 2.0-3 thru 2.0-7, 3.2-1, 3.2-2, 3.4-1, 3.6-1, 3.9-1 thru 3.9-3, 3.13-1, 5.0-1 thru 5.0-4: Street names for Garfield and Grantland are incorrectly labeled.
2. Figure 2.0-6: The existing ponding basin on the southwest corner of Dakota and Garfield is owned by FMFCD. The dual designation of Medium Low Density should be removed.
3. Page 3.9-7 Hydrology and Water Quality: Reference made to Figure 3.15-2 in Section 3.15, Utilities is not located in the RDEIR.

Casey Lauderdale, Planner
City of Fresno Planning & Development Department
Notice of Availability of a Recirculated Draft Environmental Impact Report (RDEIR)
for the West Area Neighborhoods Specific Plan
Drainage Areas “AH”, “AI”, “AJ”, “AK”, “AL”, “AN”,
“CD”, “CG”, “CH”, “CI”, “EO”, “EJ”, “EM”, “EN”, “XX”
April 28, 2025
Page 3

4. Page 4.0-15 Other CEQA-Required Topics: Revise third paragraph sentence to replace the word ditches and storm drains with “installation of parallel storm drains and/or on-site retention facilities”.

The City of Fresno, FMFCD, the County of Fresno, the City of Clovis, and the California State University, Fresno are currently covered as Co-Permittees for Municipal Separate Storm Sewer System (MS4) discharges through National Pollutant Discharge Elimination System (NPDES) General Order No. R5-2016-0040 and NPDES Permit No. CAS0085324 (Storm Water Permit) effective May 17, 2018. The previous Storm Water Permit adopted on May 31, 2013 required the adoption of Stormwater Quality Management Program (SWQMP) that describes the Storm Water Permit implementation actions and Co-Permittee responsibilities. That SWQMP was approved by the Central Valley Regional Water Quality Control Board on April 17, 2015 and is effective until adoption of a new SWQMP, which is anticipated within the next two years.

It is FMFCD’s understanding that the City will adopt a Program EIR for the proposed West Area Neighborhoods Specific Plan and that the Program EIR may be used when considering approval of future discretionary actions. The Storm Water Permit requires that Co-Permittees update their CEQA process to incorporate procedures for considering potential stormwater quality impacts when preparing and reviewing CEQA documents. This requirement is found on Provision D.14 of the 2013 Storm Water Permit and in Section 7: Planning and Land Development Program – PLD 3 – Update CEQA Process. The District has created a guidance document that will meet this Storm Water Permit requirement entitled *Guidance for Addressing Stormwater Quality for CEQA Review*, which has been attached. In an effort to streamline future CEQA processing and maintain compliance with the Storm Water Permit, FMFCD recommends that all future CEQA review within the City of Fresno utilize the attached guidance document Exhibit “A”.

Thank you for the opportunity to comment. If you have any questions or require further information, please do not hesitate to contact me at (559) 456-3292.

Sincerely,

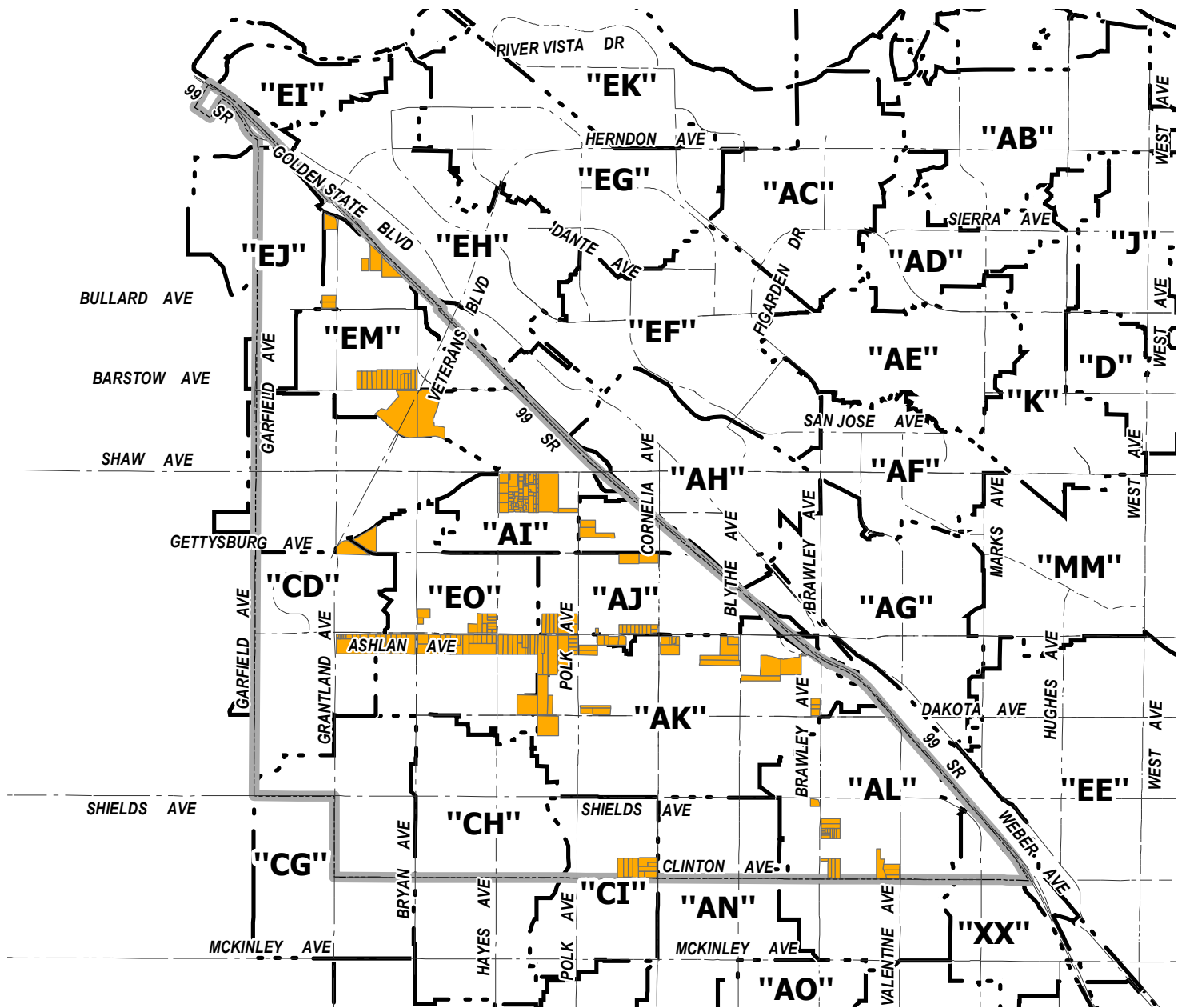


Denise Wade
Master Plan and Special Projects Manager

DW/lrl

Attachment

**NOTE: THIS MAP IS SCHEMATIC.
DISTANCES, AMOUNT OF CREDITABLE
FACILITIES, AND LOCATION OF INLET
BOUNDARIES ARE APPROXIMATE.**



LEGEND

-  Potential Areas for Mitigation
 Plan Area (WANSP)
 Drainage Area Boundary



West Area Neighborhoods Specific Plan



EXHIBIT NO. 1

FRESNO METROPOLITAN FLOOD CONTROL DISTRICT

Prepared by: alexm
Date: 4/25/2025
Path: K:\Autocad\DWGS\0EXHIBIT\MITIGATION\West Specific Plan Ex1.mxd

EXHIBIT "A"

Fresno Metropolitan Flood Control District

Guidance for Addressing Stormwater Quality for CEQA Review

Stormwater Checklist for CEQA Review

a. Potential impact of project construction on stormwater runoff.

Stormwater runoff from construction activities can have a significant impact on water quality. To build on sites with over one acre of disturbed land, property owners must obtain coverage under the California Construction General Permit for Discharges of Stormwater (CGP). The CGP is issued by the State Water Resources Control Board (SWRCB). The CGP requires sites that do not qualify for an erosivity waiver to create a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP is a site-specific plan that is designed to control the discharge of pollutants from the construction site to local storm drains and waterways.

b. Potential impact of project post-construction activity on stormwater runoff.

FMFCD operates the Regional Stormwater Mitigation System, which consists of facilities to handle stormwater runoff and non-stormwater discharges in the FMFCD service area. However, river discharging drainage areas and drainage areas without basin service are subject to FMFCD Policy: Providing for Compliance with Post-Development and Industrial Storm Water Pollution Control Requirements (Policy).

Development and redevelopment projects can result in discharge of pollutants to receiving waters. Pollutants of concern for a project site depend on the following factors:

- Project location;
- Land use and activities that have occurred on the project site in the past;
- Land use and activities that are likely to occur in the future; and
- Receiving water impairments.

As land use activities and site design practices evolve, particularly with increased incorporation of stormwater quality BMPs, characteristic stormwater runoff concentrations and pollutants of concern from various land use types are also likely to change.

Typical Pollutants of Concern and Sources for Post-Development Areas

Pollutant	Potential Sources
Sediment (total suspended solids and turbidity), trash and debris (gross solids and floatables)	Streets, landscaped areas, driveways, roads, construction activities, atmospheric deposition, soil erosion (channels and slopes)

Pesticides and herbicides	Residential lawns and gardens, roadsides, utility right-of-ways, commercial and industrial landscaped areas, soil wash-off
Organic materials/oxygen demanding substances	Residential laws and gardens, commercial landscaping, animal waste
Metals	Automobiles, bridges, atmospheric deposition, industrial areas, soil erosion, metal surfaces, combustion processes
Oil and grease, organics associated with petroleum	Roads, driveways, parking lots, vehicle maintenance areas, gas stations, illicit dumping to storm drains, automobile emissions, and fats, oils, and grease from restaurants
Bacteria and viruses	Lawns, roads, leaking sanitary sewer lines, sanitary sewer cross-connections, animal waste (domestic and wild), septic systems, homeless encampments, sediments/biofilms in storm drain system
Nutrients	Landscape fertilizers, atmospheric deposition, automobile exhaust, soil erosion, animal waste, detergents

Source: Adapted from USEPA, 1999 (Preliminary Data Summary of Urban Storm Water BMPs)

FMFCD's Post-Development Standards Technical Manual provides guidance for implementing stormwater quality Best Management Practices (BMPs) for drainage areas subject to the Policy, with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. The Post-Development Standards Technical Manual addresses the following objectives and goals:

- Minimize impervious surfaces and directly connect impervious surfaces in areas of new development and redevelopment, and where feasible, to maximize on-site infiltration of stormwater runoff;
- Implement pollution prevention methods supplemented by pollutant source controls and treatment, and where practical, use strategies that control the sources of pollutants or constituents (i.e., where water initially meets the ground) to minimize the transport of runoff and pollutants offsite and into MS4s;
- Preserve, and where possible create or restore, areas that provide important water quality benefits, such as riparian corridors, wetlands, or buffer zones
- Limit disturbances of natural water bodies and natural drainage systems by development, including roads, highways, and bridges;
- Identify and avoid development in areas that are particularly susceptible to erosion and sediment loss or establish guidance that protects areas from erosion and sediment loss;
- Implement source and structural controls as necessary and appropriate to protect downstream receiving water quality from increased pollutant loadings and flows (hydromodification concepts) from new development and significant redevelopment;

- Control the post-development peak stormwater runoff discharge rates and velocities to maintain or reduce pre-development downstream erosion and to protect downstream habitat; and
- Consider integration of Low Impact Development (LID) principles into project design.

The Post-Development Standards Technical Manual describes the stormwater management requirements for Priority Projects, which are identified as meeting one or more of the following and discharge to the San Joaquin River or do not have basin service:

- Home subdivisions of 10 housing units or more;
- Commercial developments greater than 100,000 square feet;
- Automotive repair shops;
- Restaurants;
- Parking lots 5,000 square feet or greater with 25 or more parking spaces and potentially exposed to urban runoff;
- Streets and roads;
- Retail gasoline outlets (RGOs); and
- Significant redevelopment projects, which are developments that result in creation or addition of at least 5,000 square feet of impervious surface on an already developed site. Significant redevelopment includes, but is not limited to, expansion of a building footprint or addition or replacement of a structure, structural developing including an increase in gross floor area and/or exterior construction or remodeling, replacement of impervious surface that is not part of a routine maintenance activity, and land disturbing activities related with structural or impervious surfaces. Where significant redevelopment results in an increase of less than 50 percent of the impervious surfaces of a previously existing development and the existing development was not subject to Post-Construction Standards, only the proposed alteration must meet the requirements of the Post-Development Standards Technical Manual.

All Priority Projects must mitigate the Stormwater Quality Design Volume (SWQDV) or Stormwater Quality Design Flow (SWQDF) through LID- or treatment-based stormwater quality BMPs or a combination thereof.

For new development or significant redevelopment projects for restaurants with less than 5,000 square feet, the project applicant must meet all the requirements of the Post-Development Standards Technical Manual except for mitigating the SWQDV or SWQDF and implementing stormwater quality BMPs.

The Post-Development Standards Technical Manual can be found on FMFCD's website here:

<http://www.fresnofloodcontrol.org/wp-content/uploads/2014/11/Post-Development-Standards-Technical-Manual.pdf>

c. Potential for discharge of stormwater from areas from material storage, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas.

Development projects may create potential impacts to stormwater from non-stormwater discharge from areas with material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work area.

Some materials, such as those containing heavy metals or toxic compounds, are of more concern than other materials. Toxic and hazardous materials must be prevented from coming in contact with stormwater runoff. Non-toxic or non-hazardous materials, such as debris and sediment, can also have significant impacts on receiving waters. Contact between non-toxic or non-hazardous materials and stormwater runoff should be limited, and such materials prevented from being discharged with stormwater runoff. To help mitigate these potential impacts, BMPs should be included to prevent discharges from leaving the property.

Refer to FMFCD Post-Development Standards Technical Manual for more information or go to <http://water.epa.gov/polwaste/nps/urban.cfm>.

d. Potential for discharge of stormwater to impact the beneficial uses of the receiving waters or areas that provide water quality benefits.

Identify receiving waters and describe activities that may impact the beneficial uses of the receiving waters or that project water quality benefits. Project that can impact beneficial uses or receiving waters may be mitigated by implementation of the FMFCD Post-Development Standards Technical Manual.

e. Potential for the discharge of stormwater to cause significant harm on the biological integrity of the water ways and water bodies.

Conservation of natural areas, soils, and vegetation helps to retain numerous functions of pre-development hydrology, including rainfall interception, infiltration, and evapotranspiration. Each project site possesses unique topographic, hydrologic, and vegetative features, some of which are more suitable for development than others. Sensitive areas, such as streams and their buffers, floodplains, wetlands, steep slopes, and highly-permeable soils, should be protected and/or restored. Slopes can be a major source of sediment and should be properly protected and stabilized. Locating development in less sensitive areas of a project site and conserving naturally vegetated areas can minimize environmental impacts from stormwater runoff.

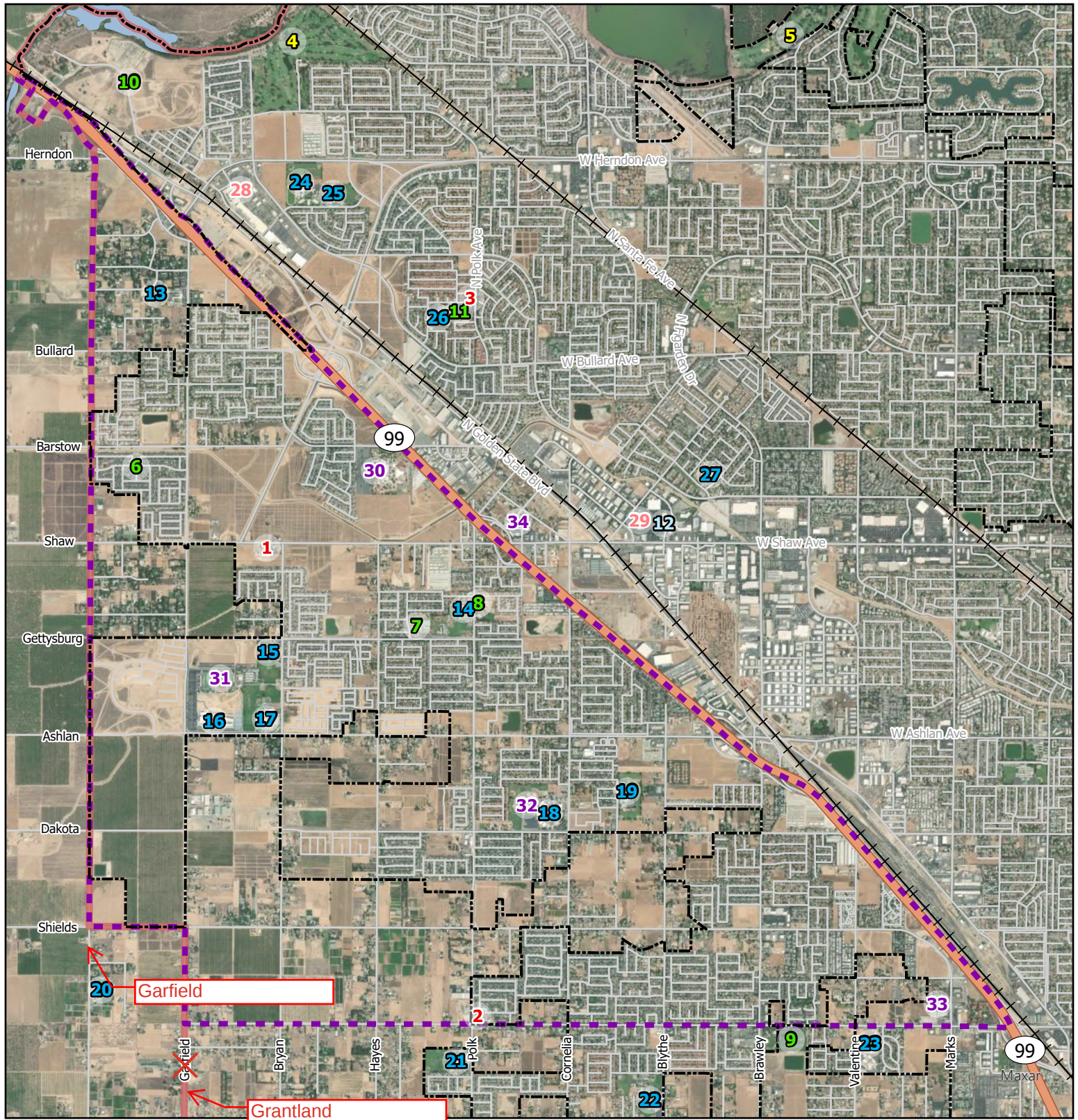
The evaluation of a project's effect on sensitive natural communities should encompass aquatic and wetland habitats. Consider "aquatic and wetland habitat" as examples of sensitive habitat.

f. Potential for significant changes in the flow velocity or volume of stormwater runoff that can cause environmental harm.

The evaluation of a project's effect on drainage patterns should refer to the FMFCD's Storm Drainage and Flood Control Master Plan and have their project reviewed by FMFCD to assess the significance of altering existing drainage patterns and to develop any mitigation measures in addition to our stormwater mitigation system. The evaluation should also consider any potential for streambed or bank erosion downstream from the project.

g. Potential for significant increases in erosion of the project site or surrounding areas.

The evaluation of a project's effect on drainage patterns should refer to the FMFCD's Storm Drainage and Flood Control Master Plan and have their project reviewed by FMFCD to assess the significance of altering existing drainage patterns and to develop any mitigation measures in addition to our stormwater mitigation system. The evaluation should also consider any potential for streambed or bank erosion downstream from the project.



LEGEND

Specific Plan Boundary

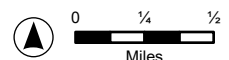
Fresno City Limits

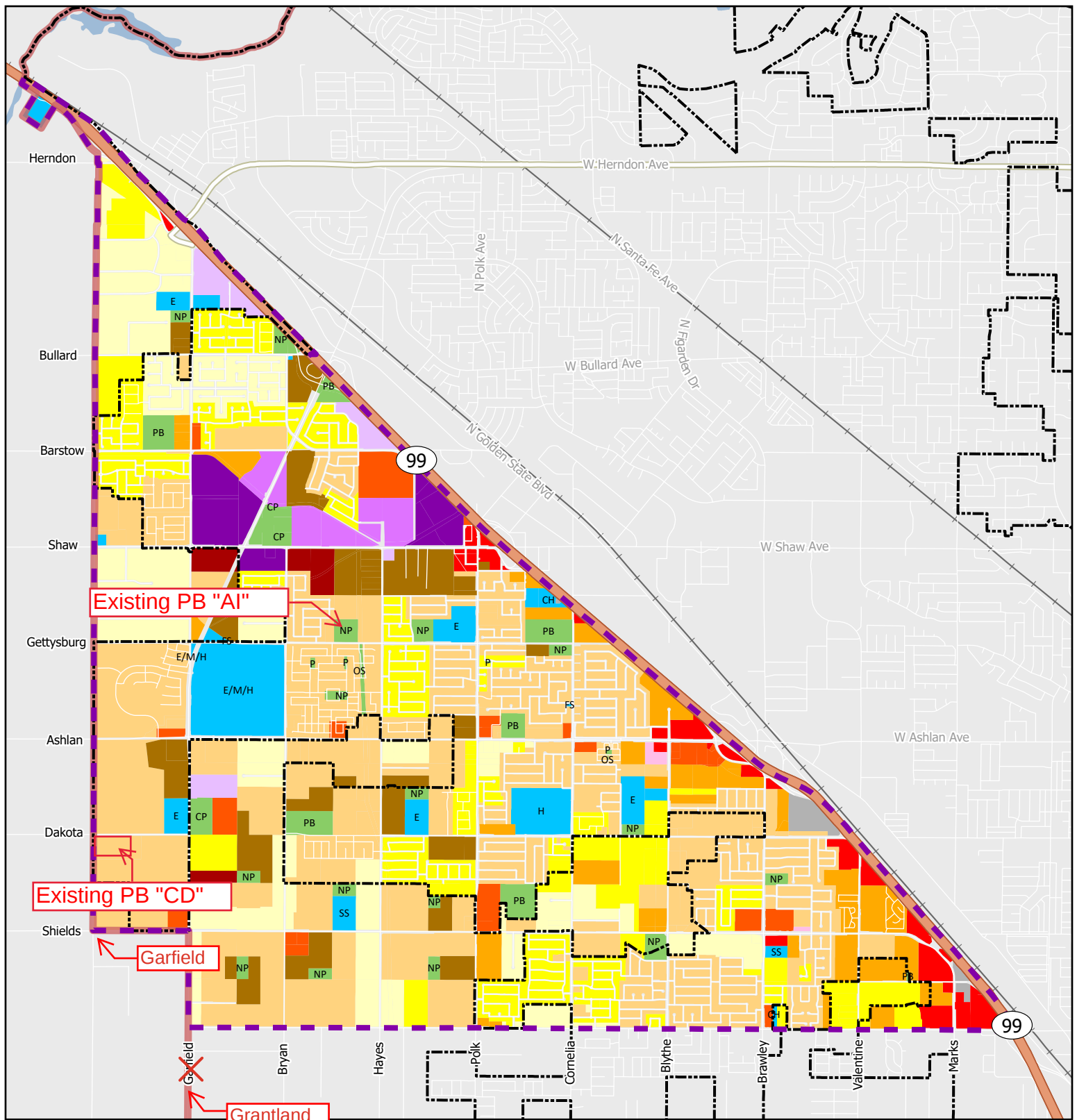
Fresno Sphere of Influence

Fire Stations		Post Office	
1	Station #18	12	US Post Office
2	Station #16	Schools	
3	Station #14	13	Herndon-Barstow Elementary School
Golf Courses		14	Teague Elementary School
4	Riverside Golf Course	15	Harvest Elementary School
5	San Joaquin Country Club	16	Justin Garza High School
Parks		17	Glacier Point Middle School
6	Neighborhood Park	18	Central High School East Campus
7	Inspiration Park	19	John Steinbeck Elementary School
8	Highway City Community Center	20	Roosevelt Elementary School
9	Jaswant Singh Khalsa Neighborhood Park	21	Central Elementary School
10	Fresno County Horse Park	22	El Capitan Middle School
11	Stallion Park	23	Hanh Phan Tilley Elementary School
		24	Rio Vista Middle School
		25	River Bluff Elementary School
		26	William Saroyan Elementary School
		27	Lawless Elementary School
		Shopping	
		28	Marketplace at El Paso
		29	Costco
		Special Point of Interest	
		30	Island Water Park
		31	Deran Koligian Stadium
		32	Central Unified Aquatics Complex
		33	Gateway Ice Center
		34	Highway City Science Center

CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 2.0-3
Aerial View of Project





LEGEND

Specific Plan Boundary

Fresno City Limits

Fresno Sphere of Influence

RESIDENTIAL

Low Density (1-3.5 D.U./acre)

Medium Low Density (3.5-6 D.U./acre)

Medium Density (5.0-12 D.U./acre)

Medium High Density (12-16 D.U./acre)

Urban Neighborhood (16-30 D.U./acre)

High Density (30-45 D.U./acre)

COMMERCIAL

Community

Recreation

General

Regional

EMPLOYMENT

Office

Business Park

Light Industrial

MIXED USE

Neighborhood Mixed Use

Corridor/Center Mixed Use

Regional Mixed Use

PUBLIC FACILITIES

Public Facilities

Church (CH) -- Fire Station (FS) -- Special School (SS)

Elementary School (E) -- High School (H)

Elementary/Middle/High School (E/M/H)

OPEN SPACE

Open Space

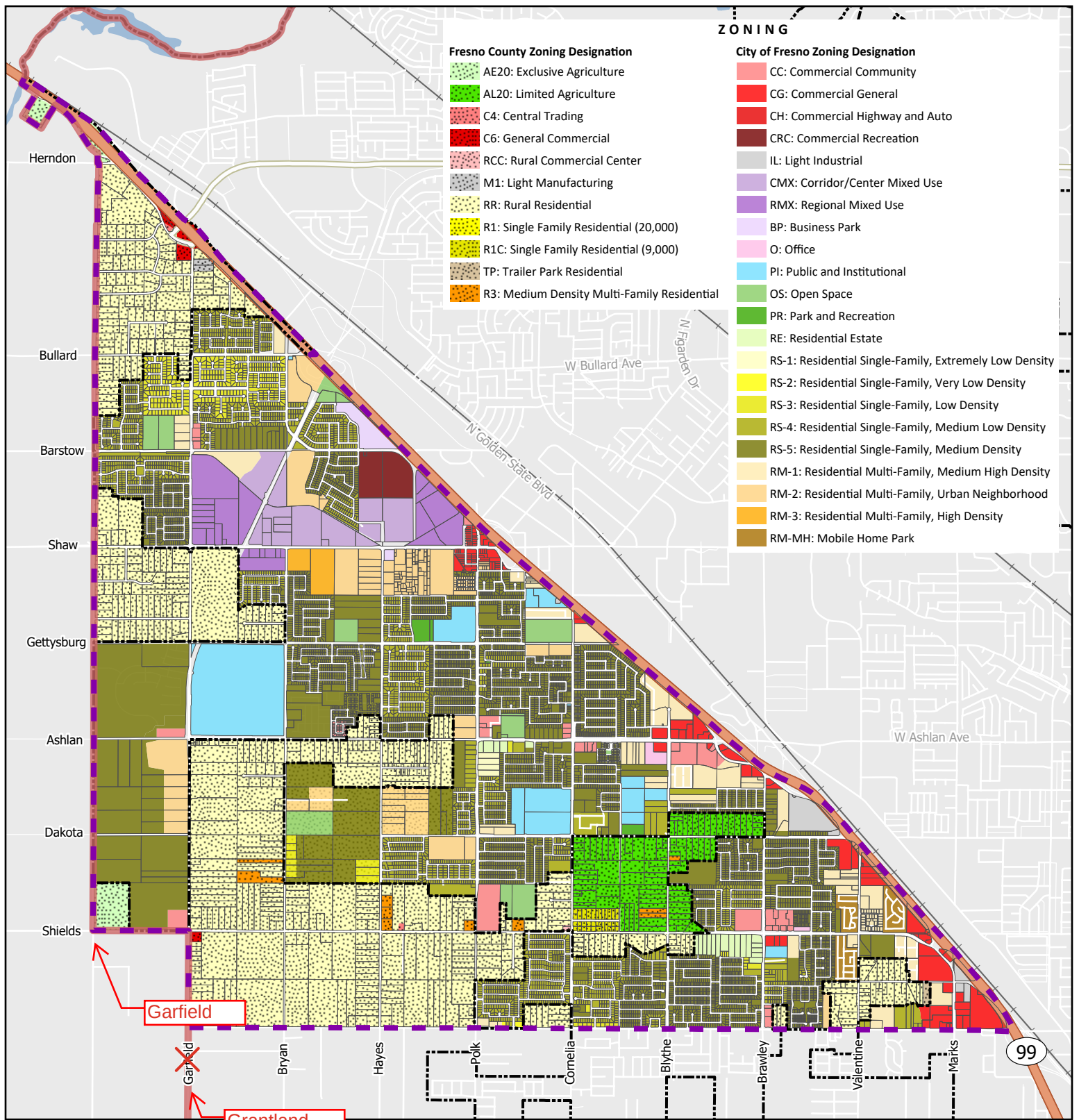
Community Park (CP) -- Neighborhood Park (NP)

Ponding Basin (PB) -- Open Space (OS) -- Park (P)

CITY OF FRESNO WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 2.0-4.
Existing General Plan

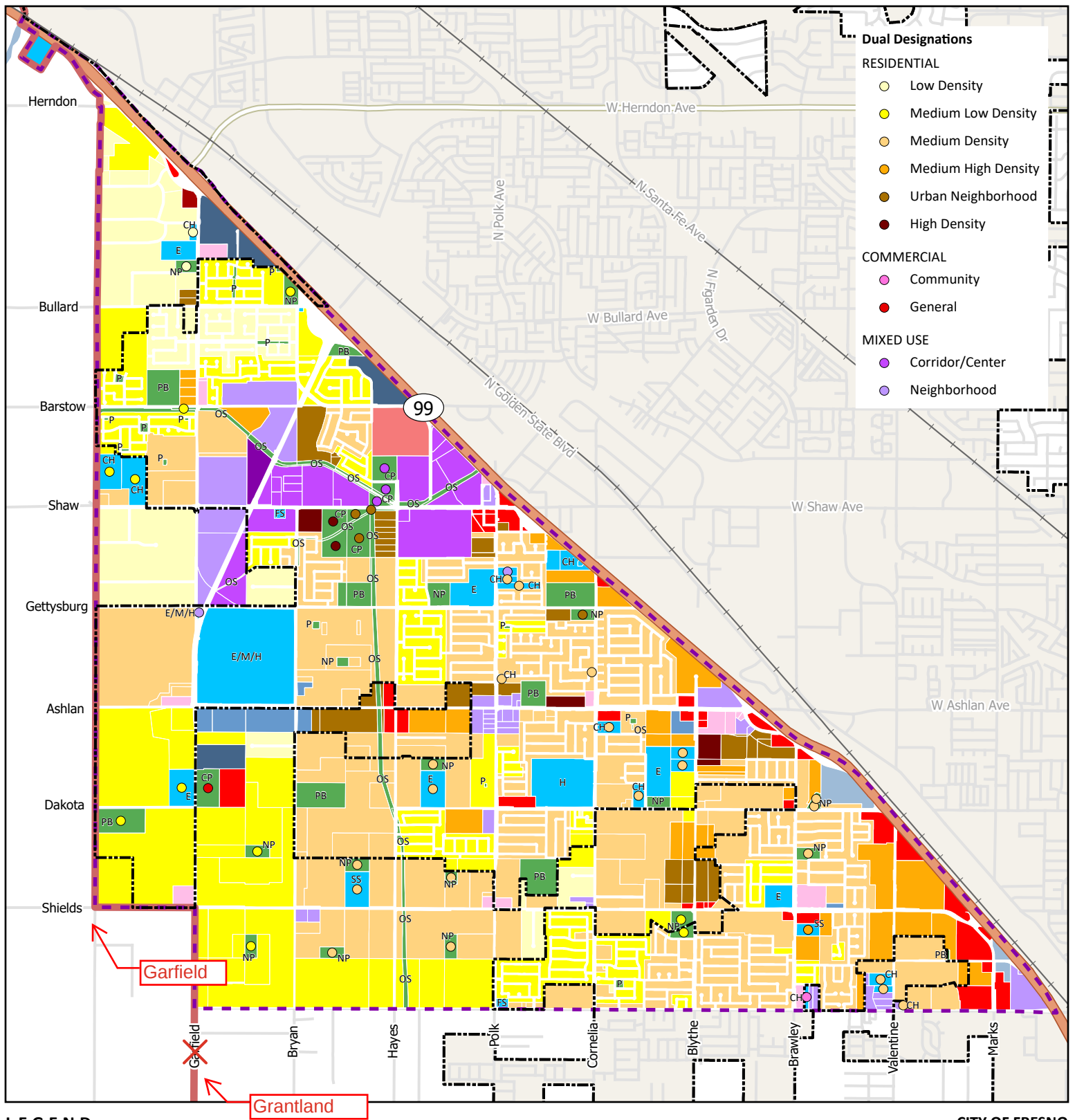




CITY OF FRESNO
WEST AREA NEIGHBORHOOD SPECIFIC PLAN

FIGURE 2.0-5.
Existing Zoning Designations



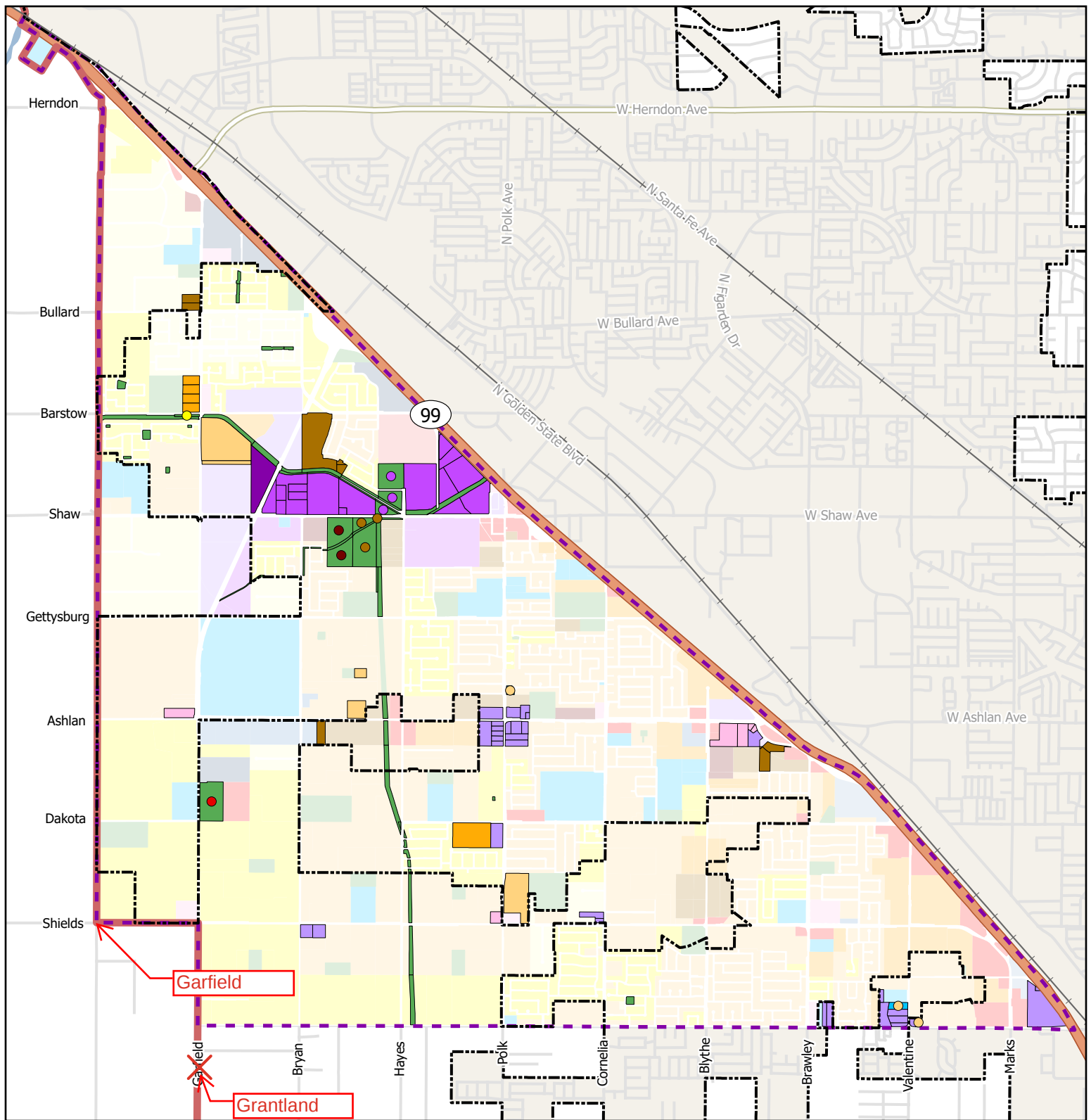


CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 2.0-6.

Proposed Specific Plan Land Uses
and Dual Designations





LEGEND

Specific Plan Boundary

Fresno City Limits

Fresno Sphere of Influence

RESIDENTIAL

Medium Density (5.0-12 D.U./acre)

Medium High Density (12-16 D.U./acre)

Urban Neighborhood (16-30 D.U./acre)

COMMERCIAL

Community

MIXED USE

Neighborhood Mixed Use

Corridor/Center Mixed Use

Regional Mixed Use

PUBLIC FACILITIES

Public Facilities

OPEN SPACE

Open Space

Dual Designations

RESIDENTIAL

Medium Low Density

Medium Density

Urban Neighborhood

High Density

COMMERCIAL

General

MIXED USE

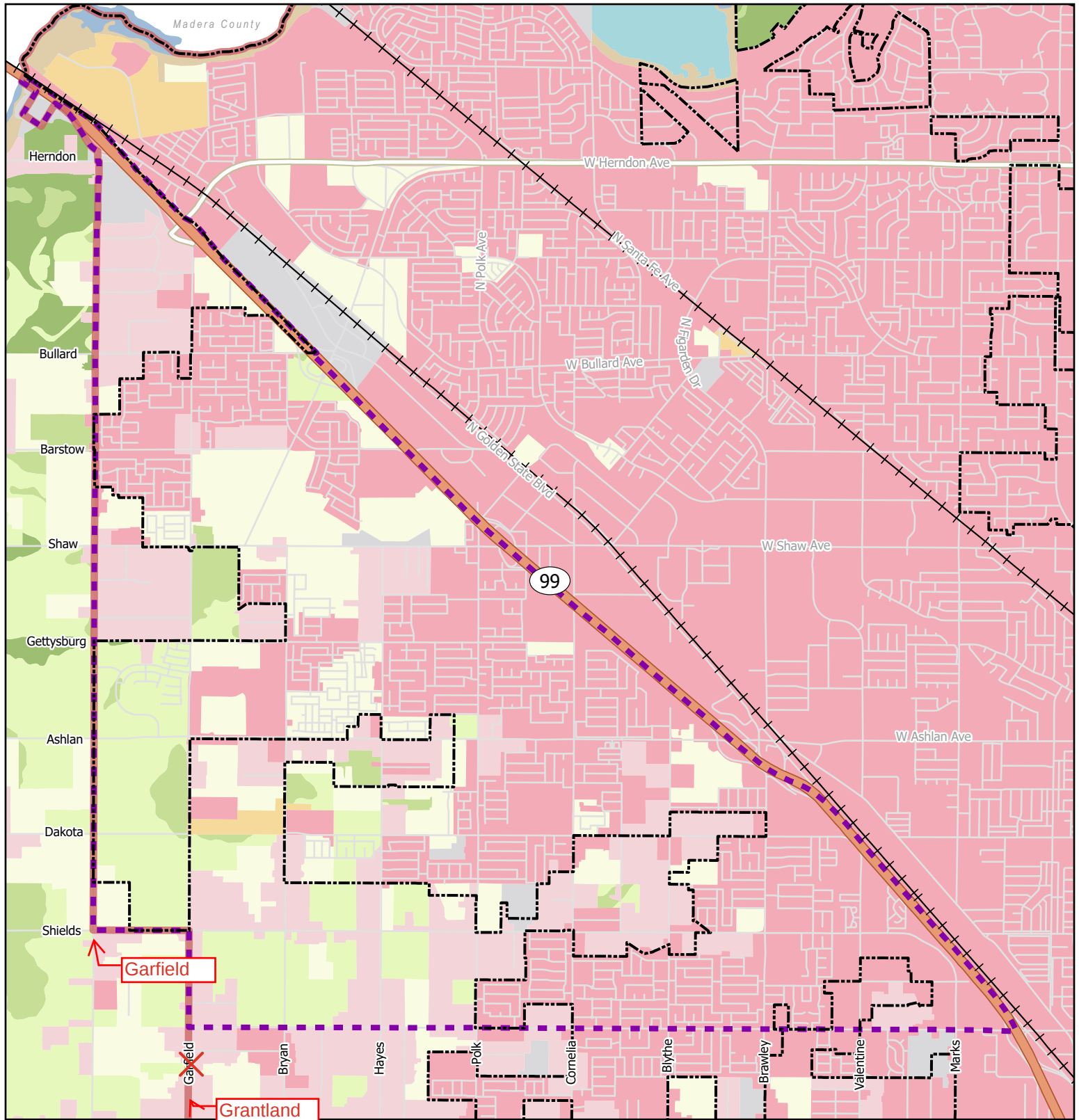
Corridor/Center

CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 2.0-7.

Changes to Proposed Specific Plan
2019-2023





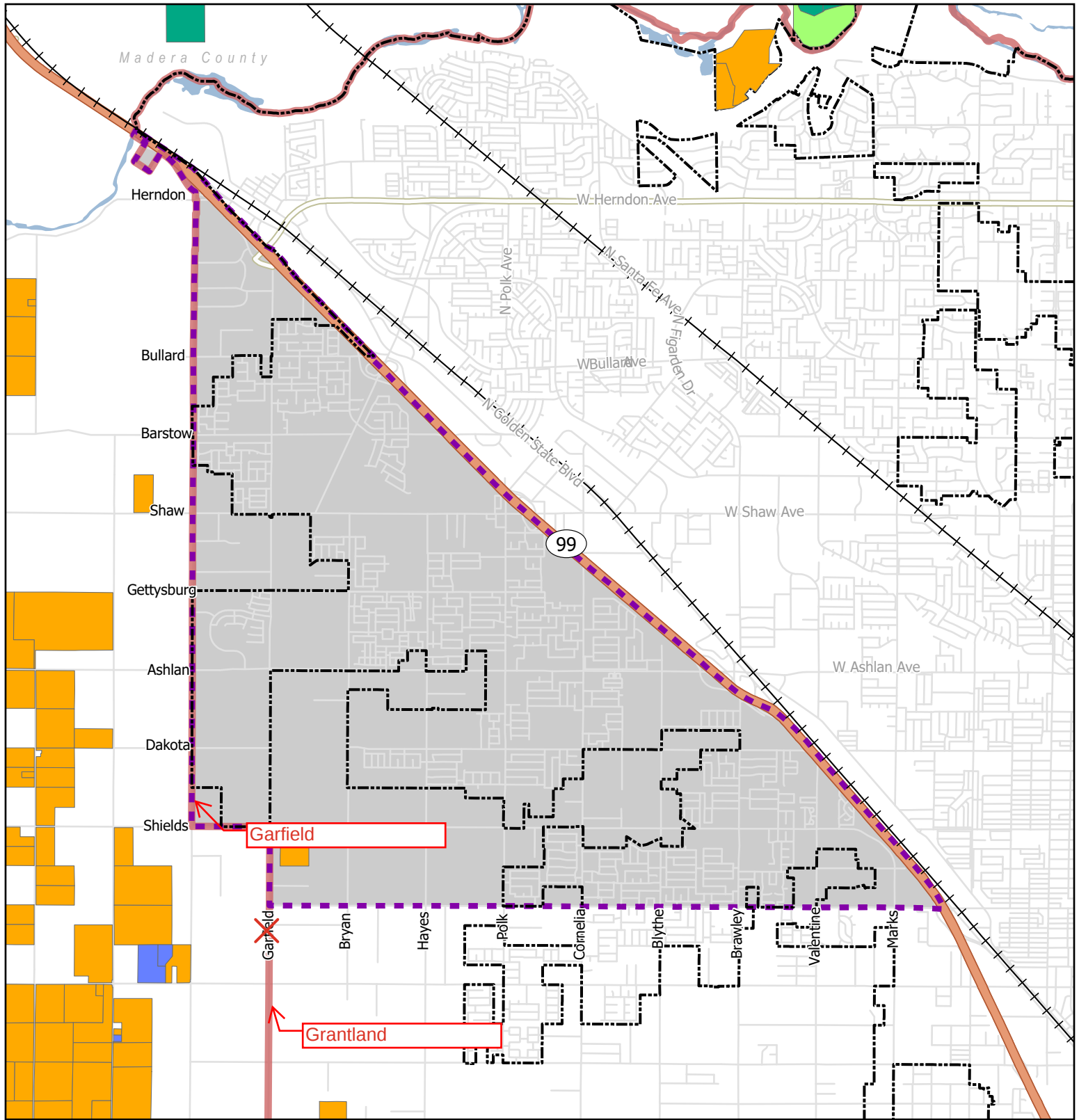
LEGEND

- | | |
|----------------------------------|---|
| Specific Plan Boundary | Nonagricultural or Natural Vegetation |
| Fresno City Limits | Vacant or Disturbed Land |
| Fresno Sphere of Influence | Rural Residential Land |
| Prime Farmland | Semi-agricultural and Rural Commercial Land |
| Farmland of Statewide Importance | Urban and Built-Up Land |
| Unique Farmland | Water Area |
| Farmland of Local Importance | |

CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 3.2-1.
Farmland Classifications





LEGEND

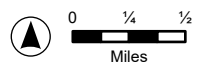
- Specific Plan Area
- Fresno City Limits
- Fresno Sphere of Influence

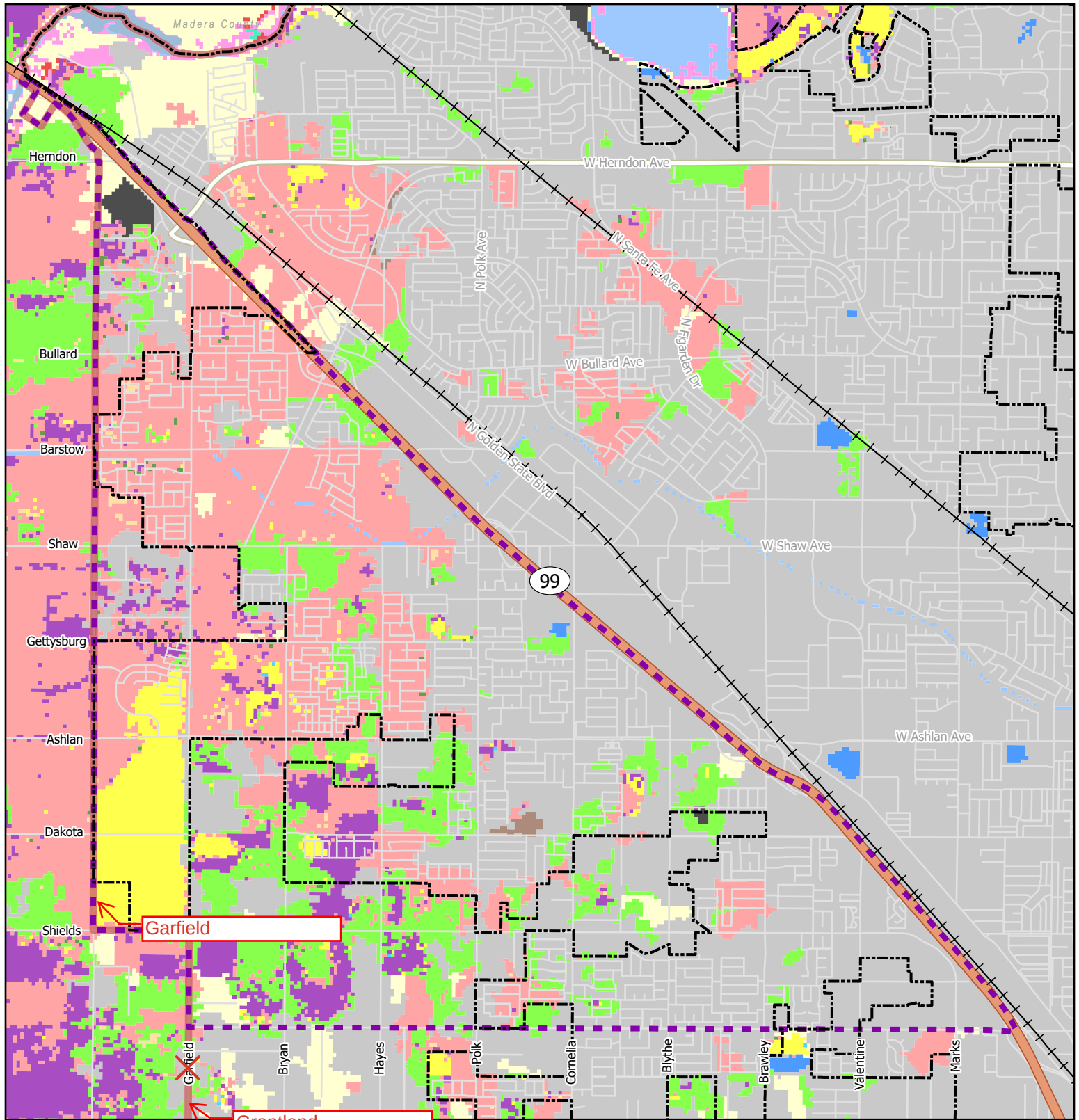
Williamson Act Enrollment Type

- Prime
- Nonprime
- Mixed
- Nonrenewal

CITY OF FRESNO
WEST AREA NEIGHBORHOOD SPECIFIC PLAN

FIGURE 3.2-2.
Williamson Act Lands





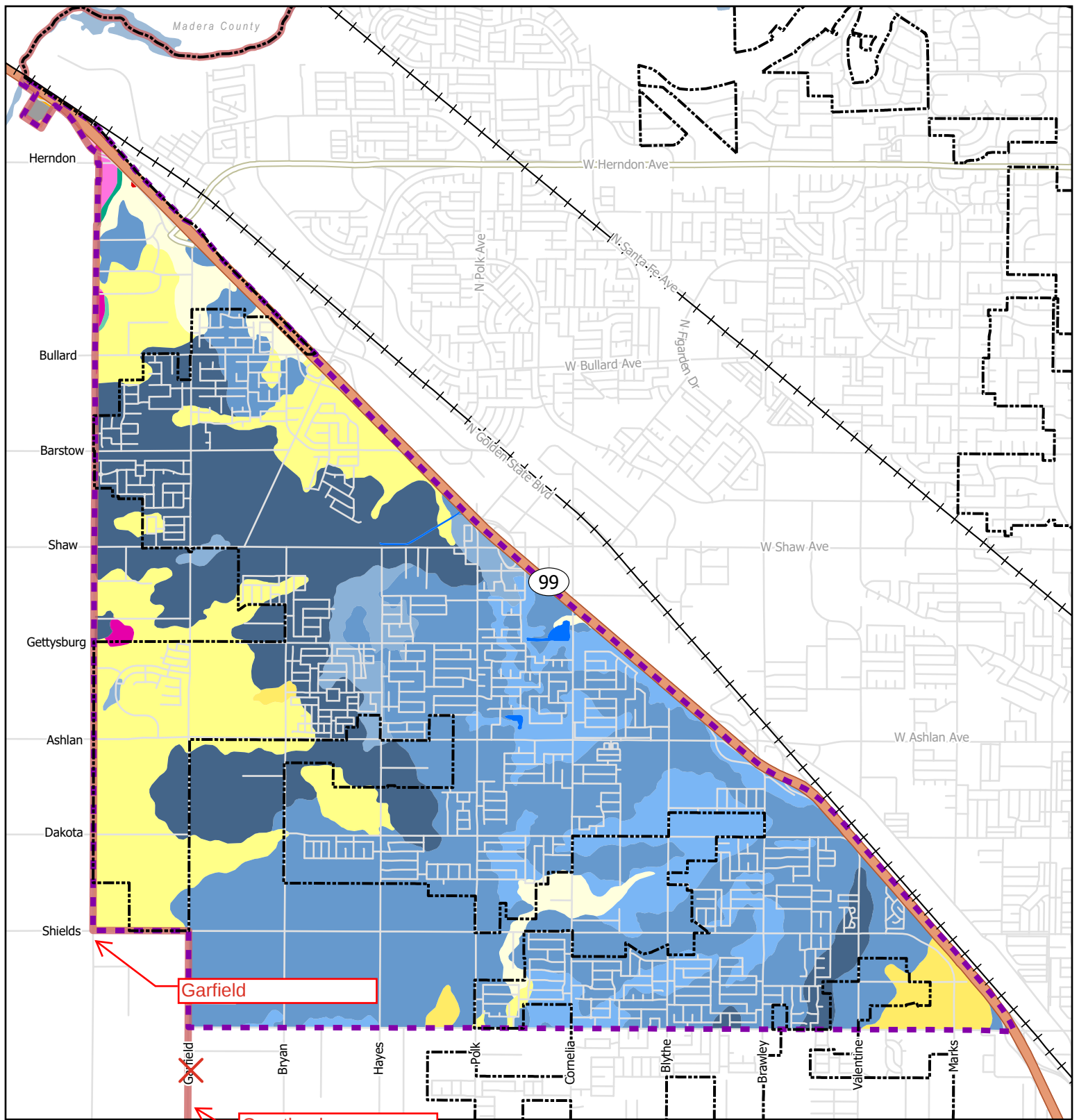
LEGEND

	Specific Plan Boundary		Eucalyptus		Pasture
	Fresno City Limits		Evergreen Orchard		Riverine
	Fresno Sphere of Influence		Fresh Emergent Wetland		Urban
	Annual Grassland		Irrigated Grain Crops		Valley Foothill Riparian
	Barren		Irrigated Hayfield		Vineyard
	Deciduous Orchard		Irrigated Row and Field Crops		
	Dryland Grain Crops		Lacustrine		

CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 3.4-1.
Land Cover Types





LEGEND

Specific Plan Boundary

Fresno City Limits

Fresno Sphere of Influence

Delhi loam sand

Delhi loamy sand, 0-3% slopes, MLRA 17

Delhi loamy sand, 3-9% slopes

Exeter loam

Exeter loam

Exeter sandy loam

Exeter sandy loam, shallow

Hanford loam

Hanford fine sandy loam, silty substratum

Hanford gravelly sandy loam

Hanford sandy loam, benches

Hesperia loam

Hesperia fine sandy loam, deep

Pollasky loam

Pollasky fine sandy loam, 2-9% slopes

Pollasky sandy loam, 9-5% slopes

San Joaquin loam

San Joaquin loam, 0-3% slopes

San Joaquin loam, shallow, 0-3% slopes

San Joaquin sandy loam, shallow, 0-3% slopes

San Joaquin sandy loam, 0-3%, MLRA 17

Other soil types

Pits

Terrace escarpments

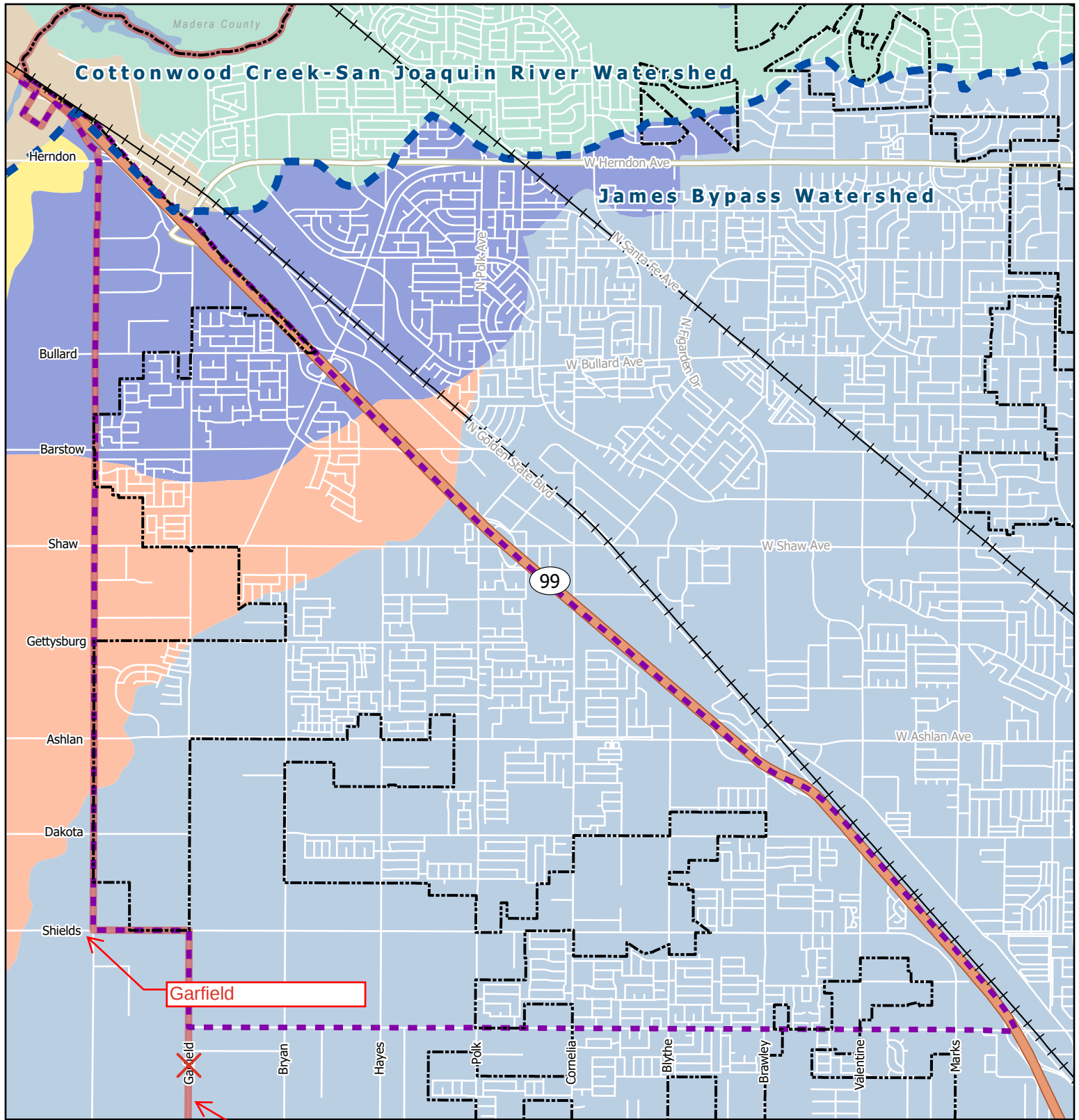
Water

CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 3.6-1.

Soil Types





LEGEND

- Specific Plan Boundary
- Fresno City Limits
- Fresno Sphere of Influence
- Watershed Boundary (HUC 10)

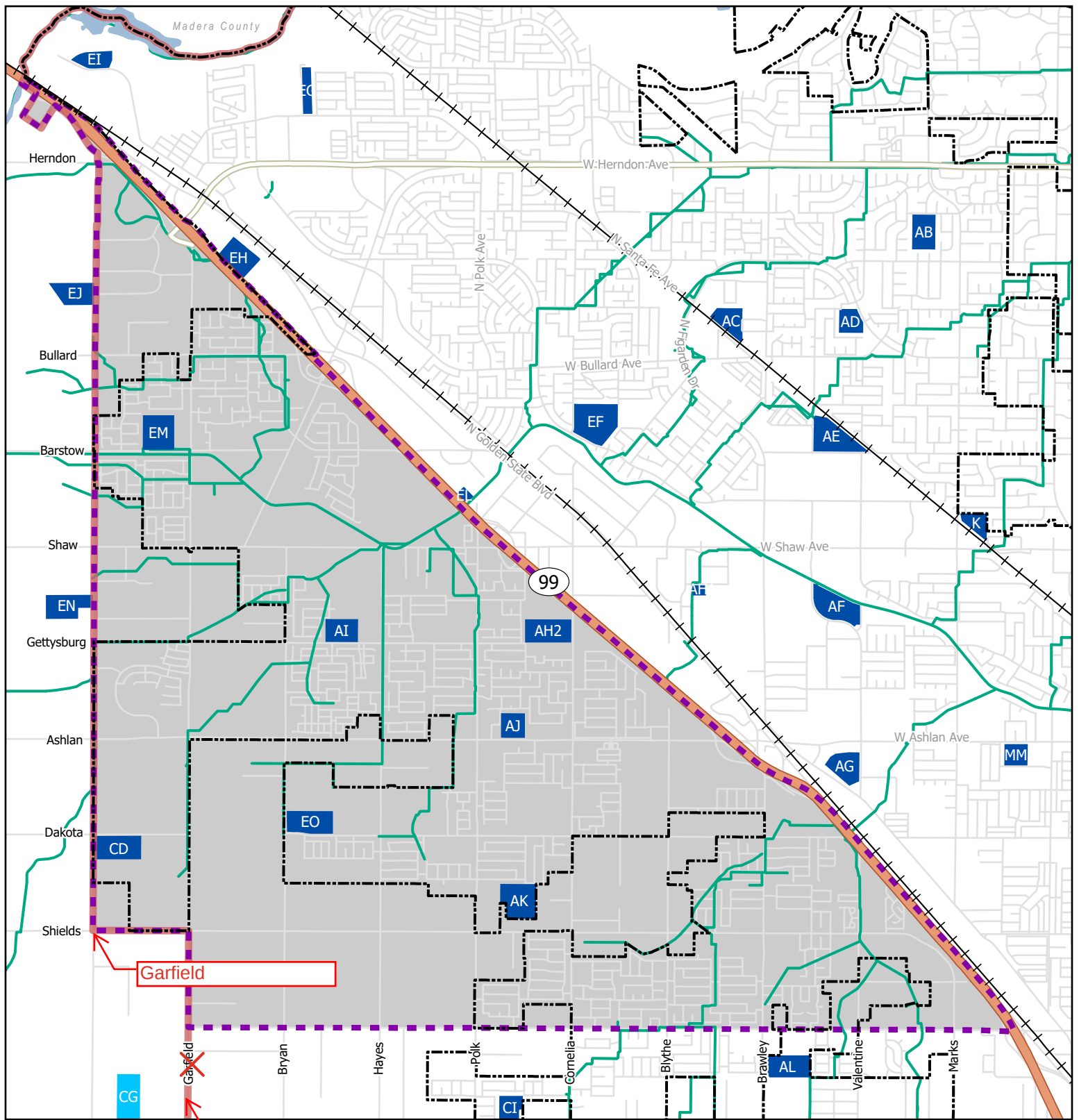
Subwatershed (HUC 12)

- Bethany Cemetery-San Joaquin River
- Empire Ditch-James Bypass
- Gates Lake
- Kennedy Owens Canal-James Bypass
- Scout Island-San Joaquin River
- Town of Rolinda-James Bypass

CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 3.9-1.
Watersheds





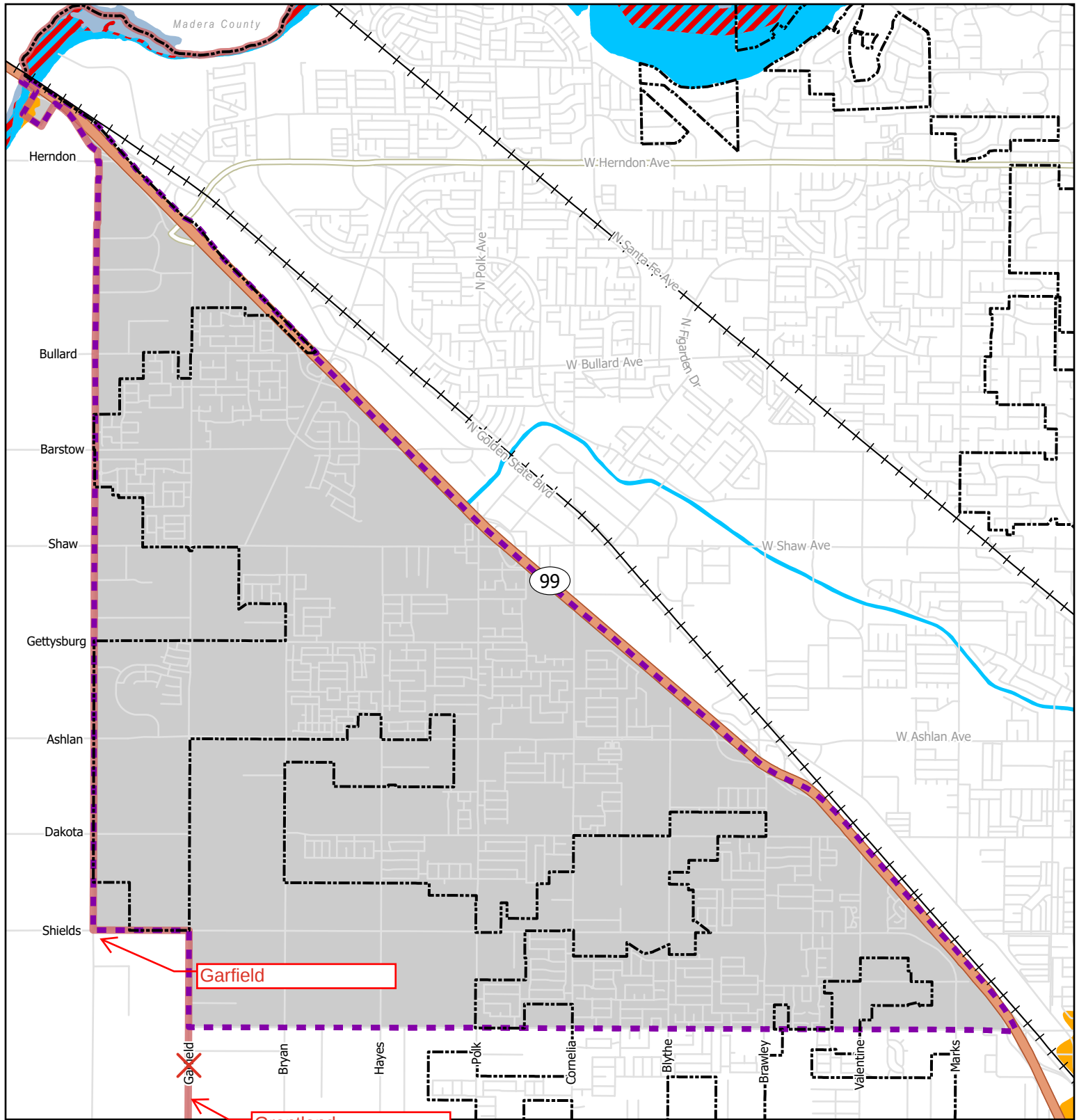
LEGEND

- Specific Plan Boundary
- Fresno City Limits
- Fresno Sphere of Influence
- FID Facility
- Existing Basin
- Proposed Basin

CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 3.9-2.
Fresno Metropolitan Flood Control District
Facilities and Basins



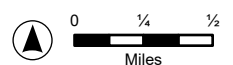


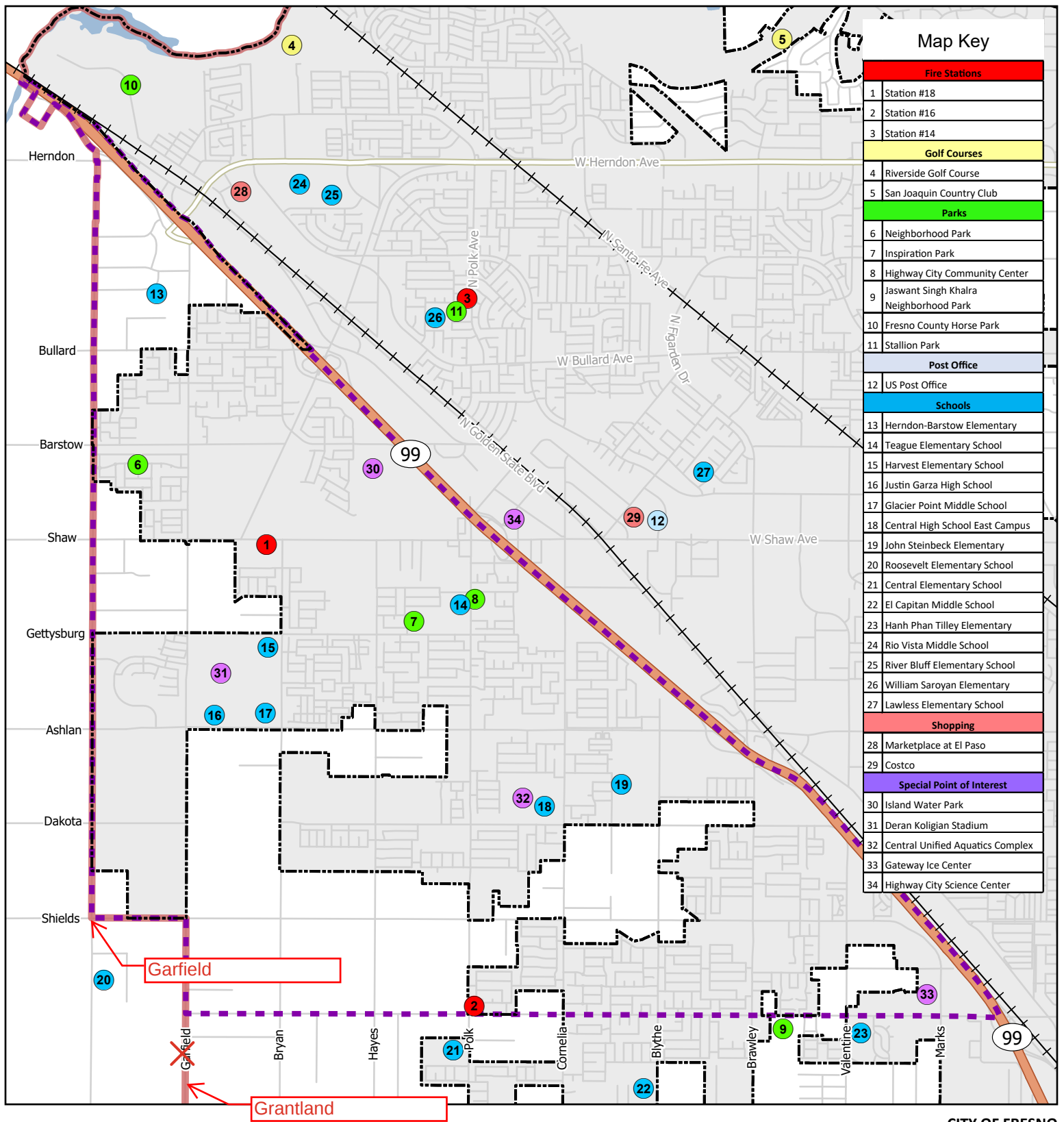
LEGEND

- Specific Plan Boundary
- Fresno City Limits
- Fresno Sphere of Influence
- 100-year Flood Zone
- Regulatory Floodway
- 500-year Flood Zone
- Area of Minimal Flood Hazard

CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 3.9-3.
FEMA Flood Zone Map

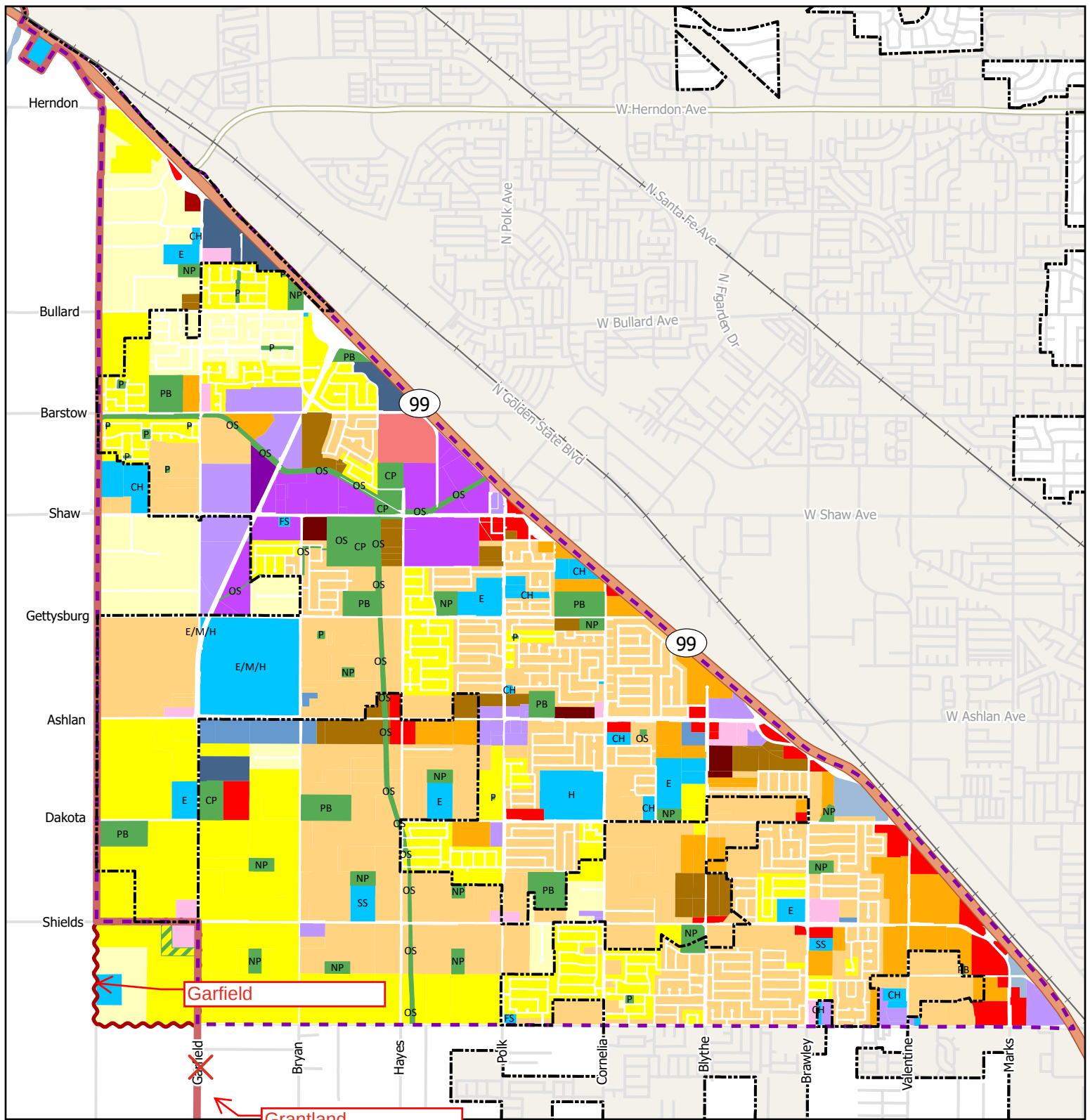




CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 3.13-1.
Public Facilities





LEGEND

- Specific Plan Boundary
- Fresno City Limits
- Fresno Sphere of Influence
- Proposed Sphere of Influence Expansion

RESIDENTIAL

- Low Density (1-3.5 D.U./acre)
- Medium Low Density (3.5-6 D.U./acre)
- Medium Density (5.0-12 D.U./acre)
- Medium High Density (12-16 D.U./acre)
- Urban Neighborhood (16-30 D.U./acre)
- High Density (30-45 D.U./acre)

COMMERCIAL

- Community
- Recreation
- General
- Regional

EMPLOYMENT

- Office
- Business Park
- Light Industrial

MIXED USE

- Neighborhood Mixed Use
- Corridor/Center Mixed Use

PUBLIC FACILITIES

- Public Facilities

*Church (CH) -- Fire Station (FS) -- Special School (SS)
Elementary School (E) -- High School (H)
Elementary/Middle/High School (E/M/H)*

OPEN SPACE

- Open Space

*Community Park (CP) -- Neighborhood Park (NP)
Ponding Basin (PB) -- Open Space (OS) -- Park (P)*

DUAL USE

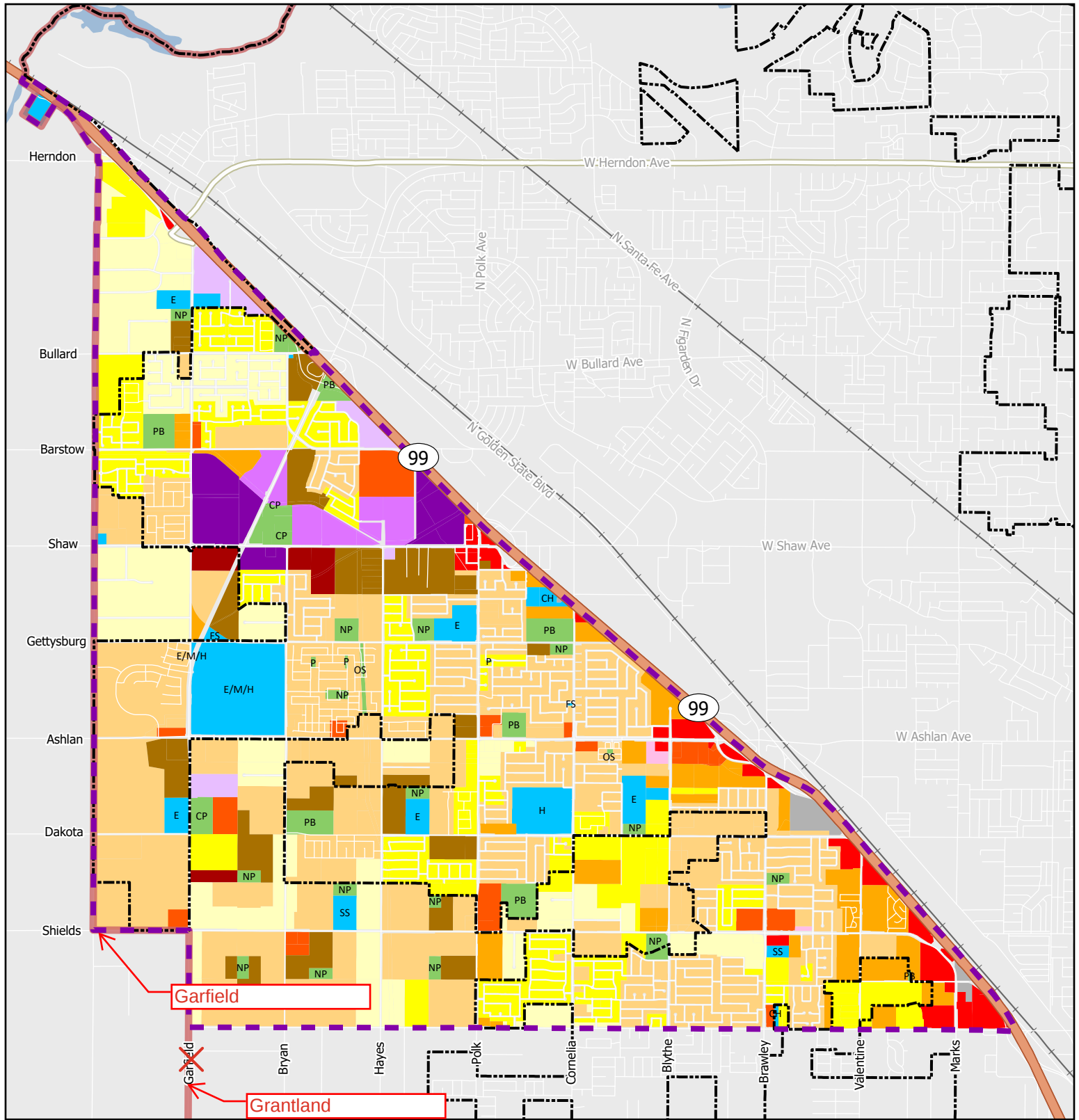
- Proposed Dual Use Basin
(Residential Medium Low and Open Space)

CITY OF FRESNO
WEST AREA NEIGHBORHOOD SPECIFIC PLAN

FIGURE 5.0-1.
Additional Annexation
Alternative

De Novo Planning Group
A Land Use Planning, Design, and Environmental Firm

Source: City of Fresno. Map date: June 19, 2024.



LEGEND

- Specific Plan Boundary
- Fresno City Limits
- Fresno Sphere of Influence

RESIDENTIAL

- Low Density (1-3.5 D.U./acre)
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- Medium Density (5.0-12 D.U./acre)
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COMMERCIAL

- Community
- Recreation
- General
- Regional

EMPLOYMENT

- Office
- Business Park
- Light Industrial

MIXED USE

- Neighborhood Mixed Use
- Corridor/Center Mixed Use
- Regional Mixed Use

PUBLIC FACILITIES

- Public Facilities

Church (CH) -- Fire Station (FS) -- Special School (SS)
 Elementary School (E) -- High School (H)
 Elementary/Middle/High School (E/M/H)

OPEN SPACE

- Open Space

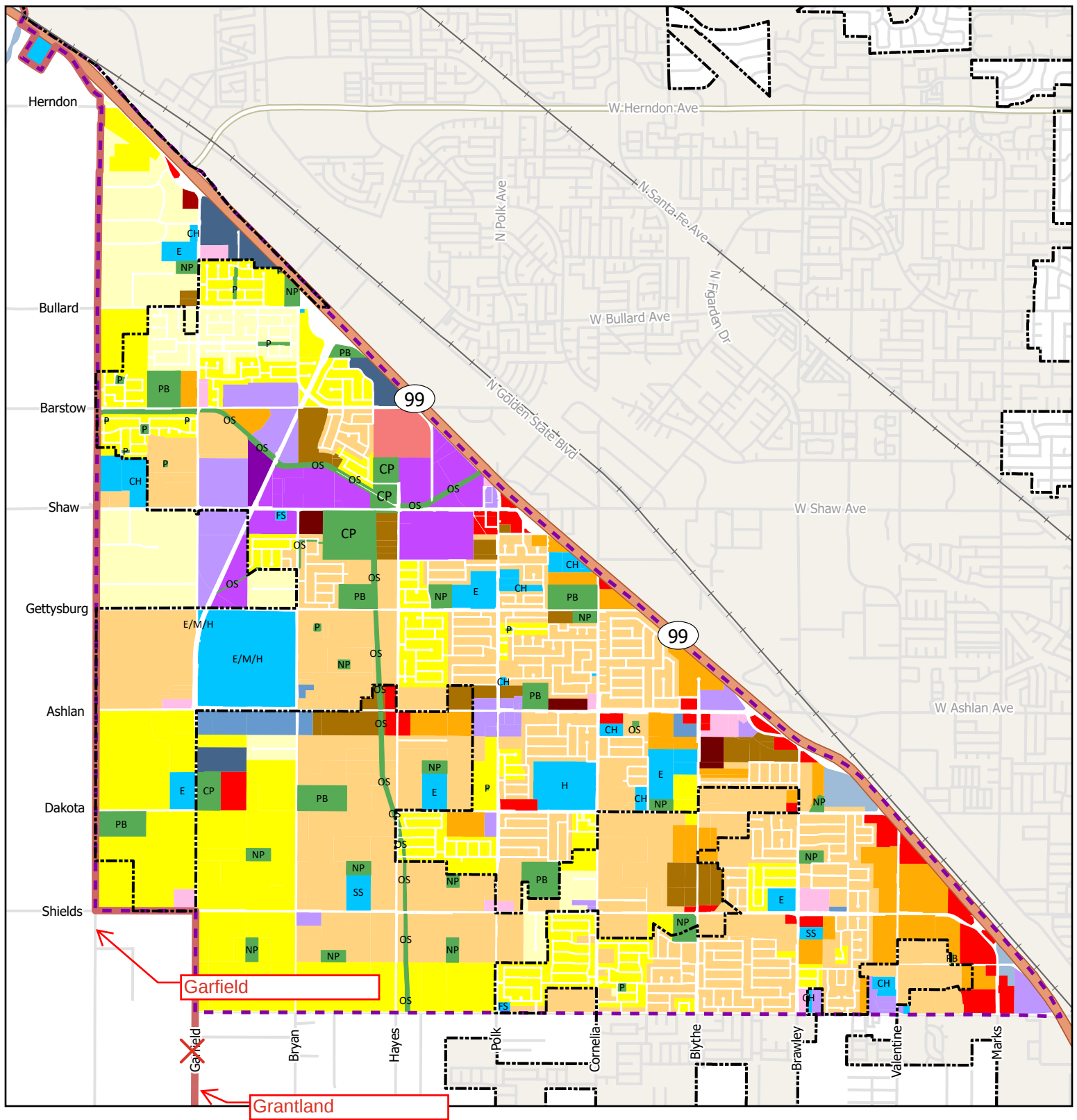
Community Park (CP) -- Neighborhood Park (NP)
 Ponding Basin (PB) -- Open Space (OS) -- Park (P)

CITY OF FRESNO WEST AREA NEIGHBORHOOD SPECIFIC PLAN

FIGURE 5.0-2.

No Project Alternative





LEGEND

- Specific Plan Boundary
- Fresno City Limits
- Fresno Sphere of Influence

RESIDENTIAL

- Low Density (1-3.5 D.U./acre)
- Medium Low Density (3.5-6 D.U./acre)
- Medium Density (5.0-12 D.U./acre)
- Medium High Density (12-16 D.U./acre)
- Urban Neighborhood (16-30 D.U./acre)
- High Density (30-45 D.U./acre)

COMMERCIAL

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- Regional Mixed Use

PUBLIC FACILITIES

- Public Facilities
- Church (CH) -- Fire Station (FS) -- Special School (SS)
- Elementary School (E) -- High School (H)
- Elementary/Middle/High School (E/M/H)

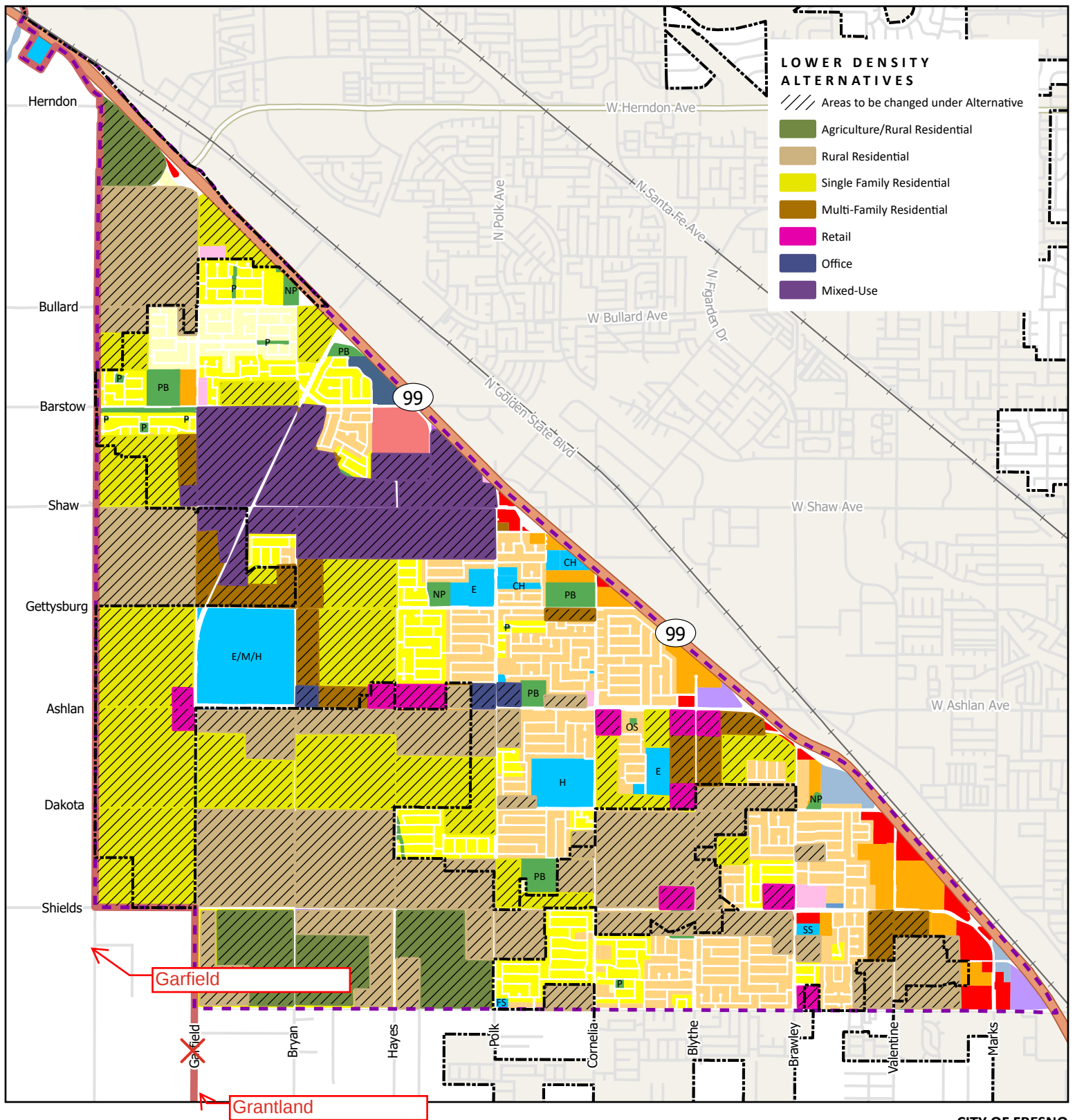
OPEN SPACE

- Open Space
- Community Park (CP) -- Neighborhood Park (NP)
- Ponding Basin (PB) -- Open Space (OS) -- Park (P)

CITY OF FRESNO WEST AREA NEIGHBORHOOD SPECIFIC PLAN

FIGURE 5.0-3.
Community Parks Alternative



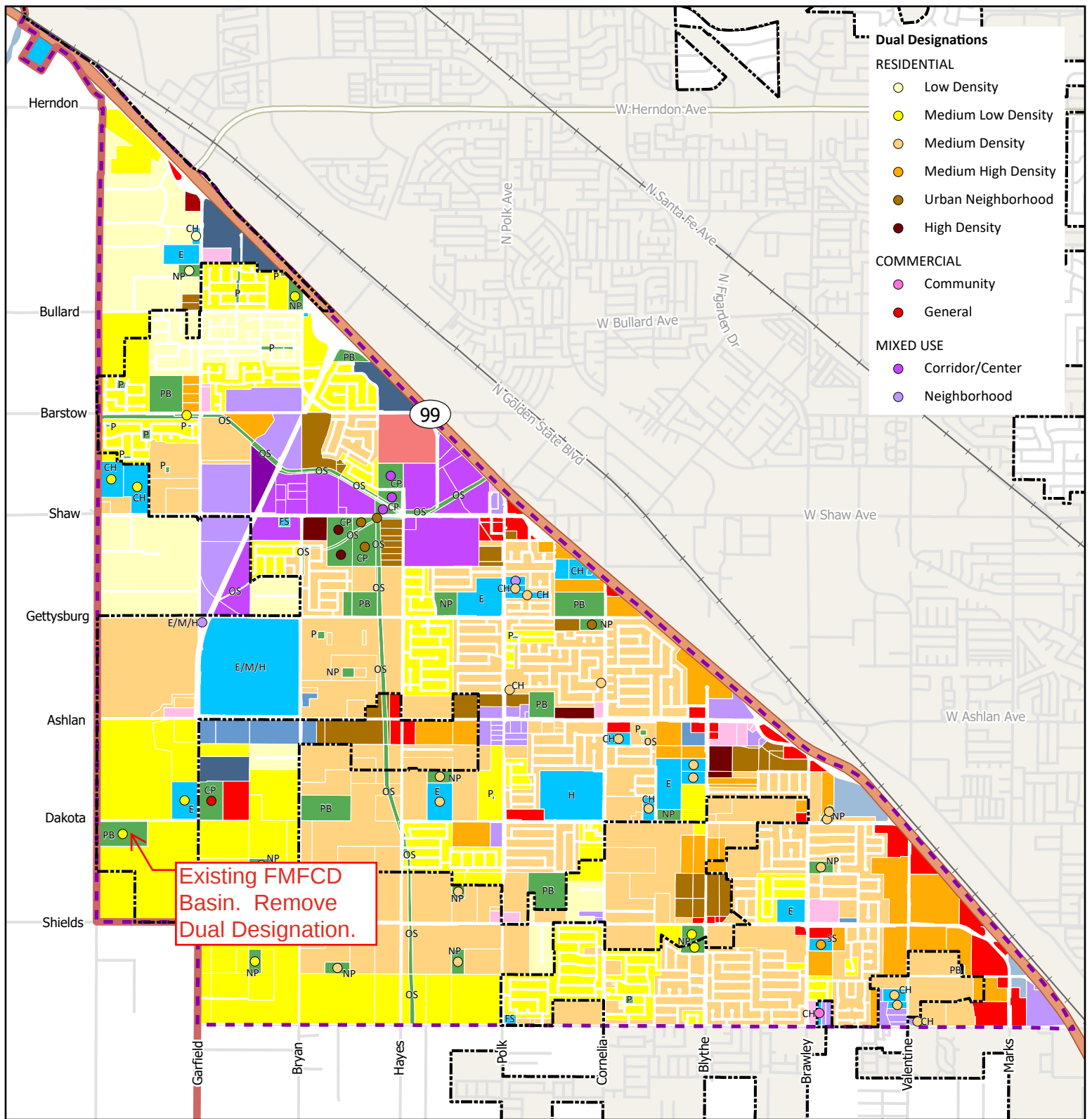


CITY OF FRESNO
WEST AREA NEIGHBORHOOD SPECIFIC PLAN

FIGURE 5.0-4.

Lower Density Alternative





CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 2.0-6.

Proposed Specific Plan Land Uses
and Dual Designations



ponding begins to occur in the streets until the pipeline system can remove the water. In the event of larger storms, “major storm breakover”, the FMFCD has planned for streets or other conveyance features to move the excess runoff to the basins. The FMFCD basin facilities in the Plan Area are shown in Figure 3.9-2.

The drainage system discharges to a system of irrigation canals, creeks, and the San Joaquin River, but is designed to retain and infiltrate as much runoff as possible into the underlying groundwater aquifer. The local drainage service area is subdivided into over 160 drainage areas, most of which drain to a retention basin. Drainage irrigation canals owned by FID within the Plan Area include:

- East Branch Victoria Canal
- Epstein Canal
- Herndon Canal
- Minor Thornton Ditch
- Silvia Ditch
- Teague School Canal
- Tracy Ditch
- West Branch Victoria Canal
- Wheaton Ditch
- Austin Ditch

The Plan Area is drained by 15 drainage watersheds, six of which are fully within the Plan Area, and nine of which drain to areas immediately south or west of the Plan Area. There are seven existing retention basins within the Plan Area and an additional five that serve the Plan Area. An additional basin is planned to serve the drainage shed in the far southwestern corner of the Plan Area. The Plan Area's storm drain system is shown on Figure 3.15-2 in Section 3.15, Utilities.

Flooding

Flooding events can result in damage to structures, injury or loss of waterborne diseases, and damage to infrastructure. In addition, standing floodwater can destroy agricultural crops, undermine infrastructure and structural foundations, and contaminate groundwater.

Update: Figure not included in RDEIR

Predicted flood conditions in the vicinity of the Plan Area are shown on Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) but are largely based on hydraulic modeling performed in 1981 (FEMA, 2016). The entire Plan Area is designated unshaded Zone X - minimal flood hazard, and would not be expected to have a flood hazard up to the level of the 0.2-percent annual chance flood. Lands designated as unshaded Zone X are outside of the Special Flood Hazard Areas. Changes to land surfaces in these areas do not trigger map revisions and no flood insurance requirements are imposed on structures in these areas. Figure 3.9-3 shows the flood boundaries, as delineated by the FEMA FIRM and USACE.

Although the Plan Area's northern boundary is very near the San Joaquin River, the area is not within a Special Flood Hazard Area. Local flooding can occur for events larger than a two-year event, but runoff is generally contained in the streets or other breakover easements. Such flooding is not reflected on FEMA's maps. Improvements to storm drainage facilities are accomplished either as a part of privately funded on-site developments or as a part of the master plan, funded by drainage fees. FMFCD maintains an on-going update to the system hydraulic model for flood control and prepares a capital improvement plan update every year with projected funding for five years.

Impact 4.9: Cumulative impacts related to hydrology and water quality. (Less than Significant and Less than Cumulatively Considerable)

Construction of the individual development projects allowed under the land use designations of the proposed Specific Plan has the potential to result in construction-related water quality impacts, impacts to groundwater recharge, and cause flooding, erosion, or siltation from the alteration of drainage patterns.

Stormwater Runoff

Implementation of the Specific Plan would increase the amount of impervious surfaces in the Plan Area, which, without intervention, could increase peak stormwater runoff rates and volumes on and downstream of the Plan Area. The entire Plan Area is within the Fresno Metropolitan Flood Control District's urban flood control system consisting of 165 drainage areas, each 1 to 2 square miles in area. Operation of projects developed under the proposed Specific Plan could generate the same categories of pollutants as construction activities. Additionally, due to future development and infrastructure projects, the overall volume of runoff in Fresno could be increased compared to existing conditions. If the drainage system is not adequately designed, Specific Plan buildout could result in localized higher peak flow rates. Localized increases in flow would be significant if increases exceeded system capacity or contributed to bank erosion.

In order to ensure that future development projects in the County do not increase downstream flood elevations due to increased peak stormwater runoff, the Fresno Metropolitan Flood Control District (FMFCD) has primary responsibility for managing the local stormwater flows for the city, as well as a large area beyond the city's boundaries. The FMFCD requires future development projects to be designed in conformance to the FMFCD's Urban Storm Drainage Master Plan to ensure storm drainage facilities are adequately designed and that the storm drain system has adequate storage capacity for additional stormwater runoff generated by the Specific Plan. Improvements to storm drainage facilities are accomplished either as a part of privately funded on-site developments or as a part of the master plan, funded by drainage fees. The FMFCD maintains a stormwater management system hydraulic model for flood control and prepares a capital improvement program every year with projected funding for five years. Surface runoff from development is managed by detention/retention basins and flow reducing Best Management Practices to reduce peak flows from the Plan Area to receiving storm drains and FMFCD facilities. Additionally, future development of the proposed Specific Plan would minimize or eliminate increases in runoff from these new impervious surfaces by runoff entering ditches and storm drains designed in conformance to FMFCD standards.

Ditches not a source of mitigating increased density. Consider revising language to read "installation of parallel storm drains and/or on-site retention facilities"

Design and construction of flood control improvements to the satisfaction of the FMFCD would ensure there is adequate storage capacity for the additional stormwater runoff generated from the buildout of the Specific Plan. Future development within the Plan Area, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans within Fresno County), would not be expected to cause any significant cumulative impacts associated with stormwater runoff.

From: [Elise Laws](#)
To: [Casey Lauderdale](#)
Subject: Fwd: SCH 2019069117 - West Area Neighborhoods Specific Plan
Date: Monday, April 28, 2025 8:17:08 AM
Attachments: [West Area Neighborhoods SP.pdf](#)

External Email: Use caution with links and attachments

Hi Casey - FYI I received a DEIR comment for WANSF. See below.

--

Elise Laws (formerly Elise Carroll) | Senior Planner

De Novo Planning Group | www.denovoplanning.com

elaws@denovoplanning.com | 916-235-0116

Northern California | 1020 Suncast Ln #106 | El Dorado Hills, CA 95762

Southern California | 180 East Main St #108 | Tustin, CA 92780

----- Forwarded message -----

From: **FresnoNaturalist** <[REDACTED]@gmail.com>
Date: Sun, Apr 27, 2025 at 10:42 PM
Subject: SCH 2019069117 - West Area Neighborhoods Specific Plan
To: elaws@denovoplanning.com <elaws@denovoplanning.com>

Good Evening,

I have observed Sanfords Arrowhead throughout Fresno and Clovis over the years. The pdf that I attached has some locations where I have taken photos in the West Area Neighborhoods Specific Plan area, and where I think I have seen the plant from afar.

I recommend adjusting Mitigation Measure 3.4-9 in Section 3.4 - Biological Resources. It states that a plant survey should take place in any "undisturbed areas." Unfortunately, every single Sanfords Arrowhead observation I have made has been in disturbed irrigation channels, golf ponds, and disturbed creeks.

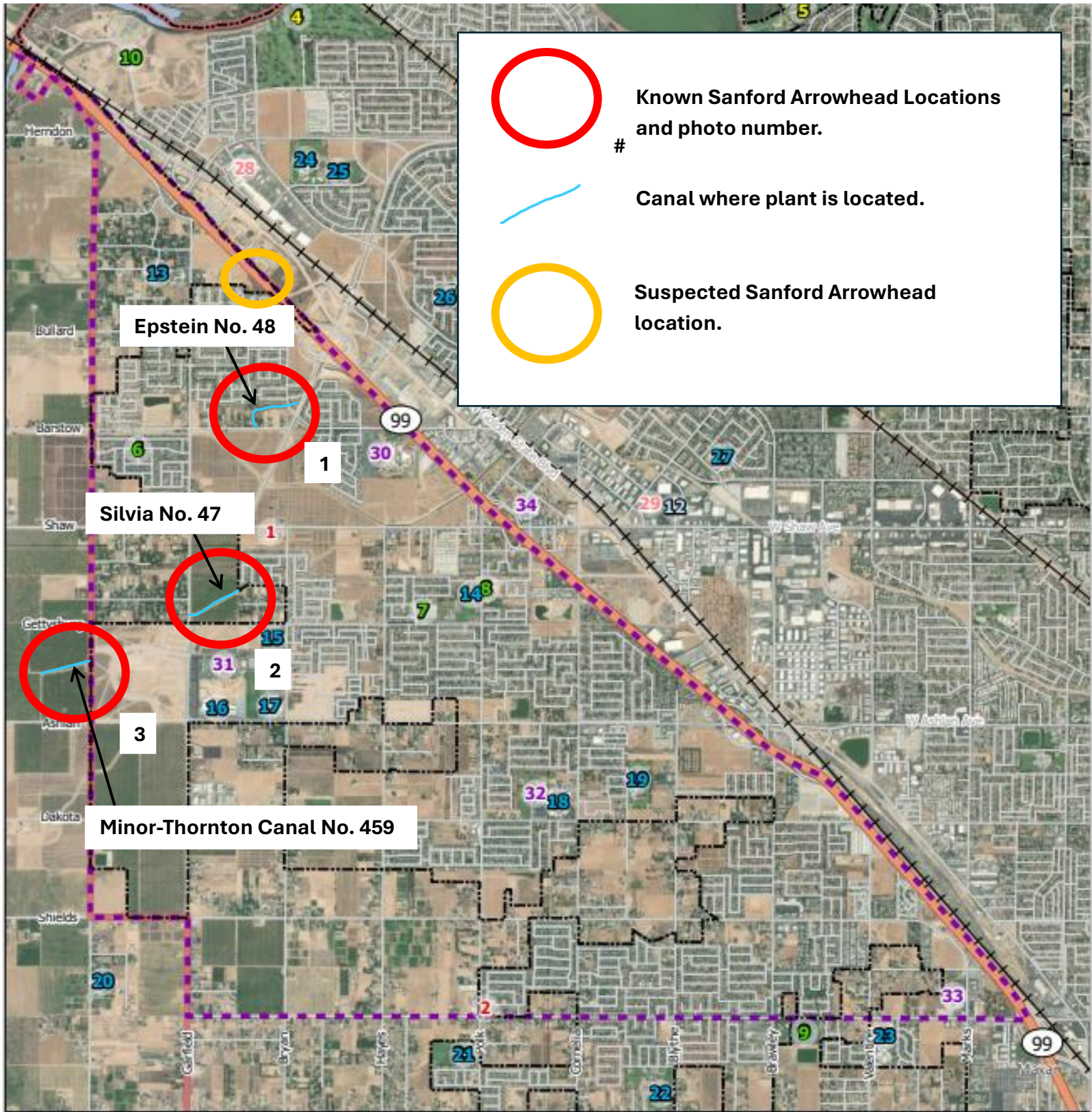
Recommendation: Require plant surveys whenever irrigation canals will be filled, cleaned, or disturbed by construction or maintenance activity as a result of a proposed project. Then implement the rest of this mitigation measure which includes contacting CNPS.

I should note that Photo 3 is outside of the specific plan area, but I imagine that the canal may be altered in connection to future development.

Including this mitigation measure is important because there were Sanford Arrowhead plants in the downstream sections of the Epstein canal that were recently filled in.

Thank you,

FN



06/10/24

12:00

Sanford Arrowhead plants



1



Sanford Arrowhead plant

08/26/20
19:43

2



Sanford Arrowhead plants

3

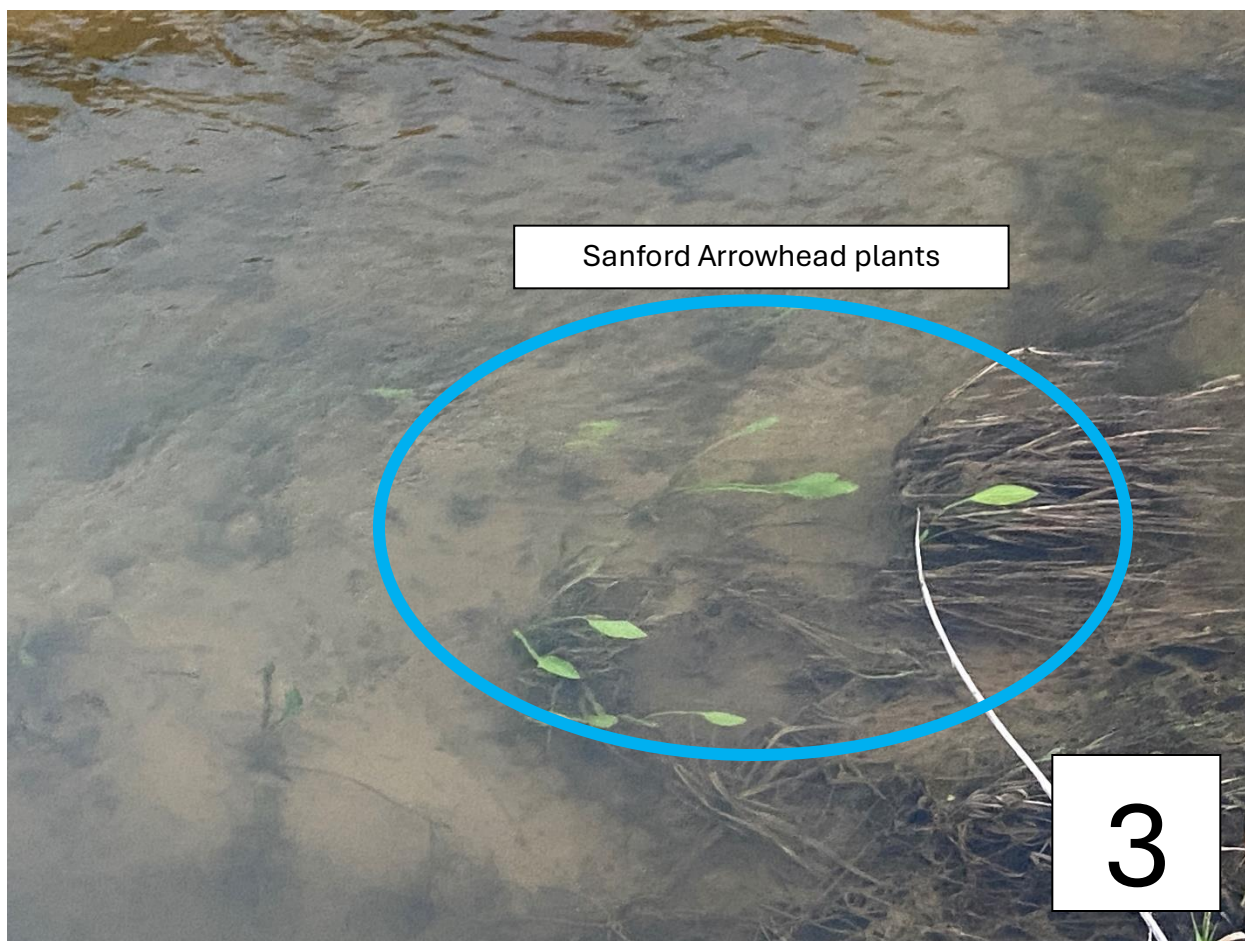
04/14/25

19:30



04/14/25

19:30



04/14/25

19:30



April 24, 2025

Casey Lauderdale
City of Fresno
Planning & Development
2600 Fresno Street
Fresno, CA 93721

**Project: Recirculated Environmental Impact Report for the West Area
Neighborhoods Specific Plan (WANSP)**

District CEQA Reference No: 20250295

Dear Ms. Lauderdale:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Recirculated Draft Environmental Impact Report (RDEIR) from the City of Fresno (City) for the project mentioned above. Per the RDEIR, the project consists of future development of up to 83,129 residential dwelling units and 59,777,271 square feet of nonresidential development (Project). The Project is located west of Highway 99, approximately north of Clinton Avenue and East of Garfield Avenue, in Fresno, CA.

The District offers the following comments at this time regarding the Project:

1) Voluntary Emission Reduction Agreement

Future development projects under implementation of the Project have the potential to result in a significant impact on air quality. Since 2005, the District has entered into Voluntary Emission Reduction Agreements (VERAs) with project proponents to mitigate air quality impacts of their development projects. The District recommends the RDEIR incorporate a discussion regarding environmental assessments prepared for future development projects include a feasibility discussion on VERAs as a mitigation measure.

A VERA is a mitigation measure by which the project proponent provides pound-for-pound mitigation of emissions increases through a process that develops, funds, and implements emission reduction projects, with the District serving a role of administrator of the emissions reduction projects and verifier of the successful mitigation effort. To implement a VERA, the project proponent and the District enter

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

into a contractual agreement in which the project proponent agrees to mitigate project specific emissions by providing funds for the District's incentives programs. The funds are disbursed by the District in the form of grants for projects that achieve emission reductions. Thus, project-related impacts on air quality can be mitigated. Types of emission reduction projects that have been funded in the past include electrification of stationary internal combustion engines (such as agricultural irrigation pumps), replacing old heavy-duty trucks with new, cleaner, more efficient heavy-duty trucks, and replacement of agricultural equipment with the latest generation technologies.

In implementing a VERA, the District verifies the actual emission reductions that have been achieved as a result of completed grant contracts, monitors the emission reduction projects, and ensures the enforceability of achieved reductions. After the project is mitigated, the District certifies to the Lead Agency that the mitigation is completed, providing the Lead Agency with an enforceable mitigation measure demonstrating that project-related emissions have been mitigated. To assist the Lead Agency and project proponent in ensuring that the environmental document is compliant with CEQA, the District recommends the environmental document includes an assessment of the feasibility of implementing a VERA.

2) Health Risk Screening/Assessment

The City should evaluate the risk associated with the Project for sensitive receptors (residences, businesses, hospitals, day-care facilities, health care facilities, etc.) in the area and mitigate any potentially significant risk to help limit exposure of sensitive receptors to emissions.

To determine potential health impacts on surrounding receptors (residences, businesses, hospitals, day-care facilities, health care facilities, etc.) a Prioritization and/or a Health Risk Assessment (HRA) should be performed for future development projects that may be approved under implementation of the Project. These health risk determinations should quantify and characterize potential Toxic Air Contaminants (TACs) identified by the Office of Environmental Health Hazard Assessment/California Air Resources Board (OEHHA/CARB) that pose a present or potential hazard to human health.

Health risk analyses should include all potential air emissions from the project, which include emissions from construction of the project, including multi-year construction, as well as ongoing operational activities of the project. Note, two common sources of TACs can be attributed to diesel exhaust emitted from heavy-duty off-road earth moving equipment during construction, and from ongoing operation of heavy-duty on-road trucks.

Prioritization (Screening Health Risk Assessment):

A "Prioritization" is the recommended method for a conservative screening-level health risk assessment. The Prioritization should be performed using the California Air Pollution Control Officers Association's (CAPCOA) methodology. Please contact the District for assistance with performing a Prioritization analysis.

The District recommends that a more refined analysis, in the form of an HRA, be performed for any project resulting in a Prioritization score of 10 or greater. This is because the prioritization results are a conservative health risk representation, while the detailed HRA provides a more accurate health risk evaluation.

Health Risk Assessment:

Prior to performing an HRA, it is strongly recommended that land use agencies/project proponents develop and submit for District review a health risk modeling protocol that outlines the sources and methodologies that will be used to perform the HRA.

A development project would be considered to have a potentially significant health risk if the HRA demonstrates that the health impacts would exceed the District's established risk thresholds, which can be found here:

<https://ww2.valleyair.org/permitting/ceqa/>.

A project with a significant health risk would trigger all feasible mitigation measures. The District strongly recommends that development projects that result in a significant health risk not be approved by the land use agency.

The District is available to review HRA protocols and analyses. For HRA submittals please provide the following information electronically to the District for review:

- HRA (AERMOD) modeling files
- HARP2 files
- Summary of emissions source locations, emissions rates, and emission factor calculations and methodologies.

For assistance, please contact the District's Technical Services Department by:

- E-Mailing inquiries to: hramodeler@valleyair.org
- Calling (559) 230-5900

Recommended Measure: Development projects resulting in TAC emissions should be located an adequate distance from residential areas and other sensitive receptors to prevent the creation of a significant health risk in accordance to CARB's Air

Quality and Land Use Handbook: A Community Health Perspective located at <https://ww2.arb.ca.gov/our-work/programs/resource-center/strategy-development/land-use-resources>.

3) Ambient Air Quality Analysis

An Ambient Air Quality Analysis (AAQA) uses air dispersion modeling to determine if emissions increases from a project will cause or contribute to a violation of State or National Ambient Air Quality Standards. The District recommends an AAQA be performed for any future development projects that may be approved under implementation of the Project with emissions that exceed 100 pounds per day of any pollutant.

An AAQA uses air dispersion modeling to determine if emission increase from a project will cause or contribute to a violation of State or National Ambient Air Quality Standards. An acceptable analysis would include emissions from both project-specific permitted and non-permitted equipment and activities. The District recommends consultation with District staff to determine the appropriate model and input data to use in the analysis.

Specific information for assessing significance, including screening tools and modeling guidance, is available online at the District's website: <https://ww2.valleyair.org/permitting/ceqa/>.

4) Allowed Uses Not Requiring Project-Specific Discretionary Approval

In the event that the City determines that a project be approved as an allowed use not requiring a project-specific discretionary approval, the District recommends the RDEIR include language requiring such projects to prepare a technical assessment, in consultation with the District, to determine if additional analysis and/or mitigation is required.

5) Industrial/Warehouse Emission Reduction Strategies

Since the Project includes industrial development, the District recommends the City incorporate emission reduction strategies that can reduce potential harmful health impacts, such as those listed below:

- Require cleanest available heavy-duty trucks and off-road equipment (see comments 6 and 8)
- Require minimization of heavy-duty truck idling (see comment 7)
- Require solid screen buffering trees, solid decorative walls, and/or other natural ground landscaping techniques are implemented along the property line of adjacent sensitive receptors

- Orient loading docks away from sensitive receptors unless physically impossible
- Require loading docks a minimum of 500 feet away from the property line of the nearest truck loading bay opening, unless dock is exclusively used for electric trucks
- Require truck entries be located on streets of a higher commercial classification
- Locate and require truck entry, exit, and internal circulation away from sensitive receptors
- Prohibit Heavy-Duty diesel truck drive aisles from being used on sides of the building that are directly adjacent to a sensitive receptor property line
- Require a separate entrance for heavy-duty trucks accessible via a truck route, arterial road, major thoroughfare, or a local road that predominantly serves commercial oriented uses
- Require projects be designed to provide the necessary infrastructure to support use of zero-emissions on-road vehicles and off-road equipment (see comment 12)
- Require all building roofs are solar-ready
- Ensure rooftop solar panels are installed and operated to supply 100% of the power needed to operate all non-refrigerated portions of the development project
- Install solar photovoltaic systems and associated battery storage on the project site
- Incorporate bicycle racks and electric bike plug-ins
- Require the use of low volatile organic compounds (VOC) architectural and industrial maintenance coatings
- Designate an area during construction to charge electric powered construction vehicles and equipment, if temporary power is available
- Prohibit the use of non-emergency diesel-powered generators during construction
- Inform the project proponent of the incentive programs (e.g., Carl Moyer Program and Voucher Incentive Program) offered to reduce air emissions from the Project
- Ensure all landscaping be drought tolerant

6) Cleanest Available Heavy-Duty Trucks

The San Joaquin Valley will not be able to attain stringent health-based federal air quality standards without significant reductions in emissions from HHD trucks, the single largest source of NO_x emissions in the San Joaquin Valley. Accordingly, to meet federal air quality attainment standards, the District's ozone and particulate matter attainment plans rely on a significant and rapid transition of HHD fleets to zero or near-zero emissions technologies.

Since the WANSP includes industrial development, future development projects within the project area have the potential to generate HHD truck trips. For future development projects, the District recommends that the following measures be considered by the City to reduce Project-related operational emissions:

- *Recommended Measure:* Fleets associated with operational activities utilize the cleanest available HHD trucks, including zero and near-zero technologies.
- *Recommended Measure:* All on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) utilize zero-emissions technologies.

7) Reduce Idling of Heavy-Duty Trucks

The goal of this strategy is to limit the potential for localized PM_{2.5} and toxic air contaminant impacts associated with the idling of Heavy-Duty trucks. The diesel exhaust from idling has the potential to impose significant adverse health and environmental impacts.

Since future development projects have the potential to generate HHD truck trips, the District recommends the RDEIR include measures to ensure compliance of the state anti-idling regulation (13 CCR § 2485 and 13 CCR § 2480) and discuss the importance of limiting the amount of idling, especially near sensitive receptors. In addition, the District recommends the City consider the feasibility of implementing a more stringent 3-minute idling restriction and requiring appropriate signage and enforcement of idling restrictions.

8) Electric On-Site Off-Road and On-Road Equipment

Future development projects may have the potential to result in increased use of off-road equipment (e.g., forklifts) and on-road equipment (e.g., mobile yard trucks with the ability to move materials). The District recommends that the RDEIR include requirements for project proponents to utilize electric or zero emission off-road and on-road equipment.

9) Under-fired Charbroilers

Future development projects have the potential to include restaurants with under-fired charbroilers. Such charbroilers may pose the potential for immediate health risk, particularly when located in densely populated areas or near sensitive receptors.

Since the cooking of meat can release carcinogenic PM_{2.5} species, such as polycyclic aromatic hydrocarbons, controlling emissions from new under-fired charbroilers will have a substantial positive impact on public health. The air quality impacts on neighborhoods near restaurants with under-fired charbroilers can be

significant on days when meteorological conditions are stable, when dispersion is limited and emissions are trapped near the surface within the surrounding neighborhoods. This potential for neighborhood-level concentration of emissions during evening or multi-day stagnation events raises air quality concerns.

Furthermore, reducing commercial charbroiling emissions is essential to achieving attainment of multiple federal PM_{2.5} standards. Therefore, the District recommends that the RDEIR include a measure requiring the assessment and potential installation, as technologically feasible, of particulate matter emission control systems for new large restaurants operating under-fired charbroilers.

The District is available to assist the City and project proponents with this assessment. Additionally, the District is currently offering substantial incentive funding that covers the full cost of purchasing, installing, and maintaining the system during a demonstration period covering two years of operation. Please contact the District at (559) 230-5800 or technology@valleyair.org for more information, or visit: <https://ww2.valleyair.org/grants/restaurant-charbroiler-technology-partnership/>

10)Vegetative Barriers and Urban Greening

For future development projects within the Project area, and at strategic locations throughout the Project area in general, the District suggests the City consider incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors (e.g., residences, schools, healthcare facilities).

While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, vegetative barriers have been shown to be an additional measure to potentially reduce a population's exposure to air pollution through the interception of airborne particles and the uptake of gaseous pollutants. Examples of vegetative barriers include, but are not limited to the following: trees, bushes, shrubs, or a mix of these. Generally, a higher and thicker vegetative barrier with full coverage will result in greater reductions in downwind pollutant concentrations. In the same manner, urban greening is also a way to help improve air quality and public health in addition to enhancing the overall beautification of a community with drought tolerant, low-maintenance greenery.

11)On-Site Solar Deployment

It is the policy of the State of California that renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045. While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, the production of solar energy is contributing to improving air quality and public

health. The District suggests that the City consider incorporating solar power systems as an emission reduction strategy for future development projects that may be approved under implementation of the Project.

12) Electric Infrastructure

To support and accelerate the installation of electric vehicle charging equipment and development of required infrastructure, the District offers incentives to public agencies, businesses, and property owners of multi-unit dwellings to install electric charging infrastructure (Level 2 and 3 chargers). The purpose of the District's Charge Up! Incentive program is to promote clean air alternative-fuel technologies and the use of low or zero-emission vehicles. The District recommends that the City and project proponents install electric vehicle chargers at project sites, and at strategic locations.

Please visit <https://ww2.valleyair.org/grants/charge-up> for more information.

13) District Rules and Regulations

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: <https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations>. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

13a) District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to

Operate (PTO) from the District. District Rule 2201 (New and Modified Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT).

Future development projects may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. Prior to construction, project proponents shall obtain an ATC permit from the District for equipment/activities subject to District permitting requirements.

Recommended Mitigation Measure: For projects subject to permitting by the San Joaquin Valley Air Pollution Control District, demonstration of compliance with District Rule 2201 (obtain ATC permit from the District) shall be provided to the City before issuance of the first building permit.

For further information or assistance, project proponents may contact the District's SBA Office at (559) 230-5888.

13b) District Rule 9510 - Indirect Source Review (ISR)

Accordingly, future development projects within the WANSP may be subject to District Rule 9510 if upon full buildout, the project would equal or exceed any of the following applicability thresholds, depending on the type of development and public agency approval mechanism:

Table 1: ISR Applicability Thresholds

Development Type	Discretionary Approval Threshold	Ministerial Approval / Allowed Use / By Right Thresholds
Residential	50 dwelling units	250 dwelling units
Commercial	2,000 square feet	10,000 square feet
Light Industrial	25,000 square feet	125,000 square feet
Heavy Industrial	100,000 square feet	500,000 square feet
Medical Office	20,000 square feet	100,000 square feet
General Office	39,000 square feet	195,000 square feet
Educational Office	9,000 square feet	45,000 square feet
Government	10,00 square feet	50,000 square feet
Recreational	20,000 square feet	100,000 square feet
Other	9,000 square feet	45,000 square feet

District Rule 9510 also applies to any transportation or transit development projects where construction exhaust emissions equal or exceed two tons of NOx or two tons of PM.

The purpose of District Rule 9510 is to reduce the growth in both NO_x and PM emissions associated with development and transportation projects from mobile and area sources; specifically, the emissions associated with the construction and subsequent operation of development projects. The Rule requires developers to mitigate their NO_x and PM emissions by incorporating clean air design elements into their projects. Should the proposed development project clean air design elements be insufficient to meet the required emission reductions, developers must pay a fee that ultimately funds incentive projects to achieve off-site emissions reductions.

In the case the individual development project is subject to District Rule 9510, per Section 5.0 of the rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency so that proper mitigation and clean air design under ISR can be incorporated into the public agency's analysis.

Information about how to comply with District Rule 9510 can be found online at: <https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview>

The AIA application form can be found online at: <https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview/forms-and-applications/>

District staff is available to provide assistance with determining if future development projects will be subject to Rule 9510, and can be reached by phone at (559) 230-5900 or by email at ISR@valleyair.org.

13c) District Rule 9410 (Employer Based Trip Reduction)

Future development projects may be subject to District Rule 9410 (Employer Based Trip Reduction) if the project would result in employment of 100 or more "eligible" employees. District Rule 9410 requires employers with 100 or more "eligible" employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes. Under an eTRIP plan, employers have the flexibility to select the options that work best for their worksites and their employees.

Information about District Rule 9410 can be found online at: <https://ww2.valleyair.org/compliance/rule-9410-employer-based-trip-reduction/>.

For additional information, you can contact the District by phone at 559-230-6000 or by e-mail at etrip@valleyair.org

13d) District Rule 4002 (National Emissions Standards for Hazardous Air Pollutants)

In the event an existing building will be renovated, partially demolished or removed, future development projects may be subject to District Rule 4002. This rule requires a thorough inspection for asbestos to be conducted before any regulated facility is demolished or renovated. Information on how to comply with District Rule 4002 can be found online at:
<https://ww2.valleyair.org/compliance/demolition-renovation/>

13e) District Rule 4601 (Architectural Coatings)

Future development projects may be subject to District Rule 4601 since future development projects may utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at: <https://ww2.valleyair.org/media/tkgjeusd/rule-4601.pdf>

13f) District Regulation VIII (Fugitive PM10 Prohibitions)

Future development project proponents may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities*.

Should the project result in at least 1-acre in size, future development project proponents shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, future development project proponents shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950.

The application for both the Construction Notification and Dust Control Plan can be found online at: <https://ww2.valleyair.org/media/fm3jrbsq/dcp-form.docx>

Information about District Regulation VIII can be found online at:
<https://ww2.valleyair.org/dustcontrol>

13g) District Rule 4901 - Wood Burning Fireplaces and Heaters

The purpose of this rule is to limit emissions of carbon monoxide and particulate matter from wood burning fireplaces, wood burning heaters, and outdoor wood burning devices. This rule establishes limitations on the installation of new wood burning fireplaces and wood burning heaters. Specifically, at elevations below 3,000 feet in areas with natural gas service, no person shall install a wood burning fireplace, low mass fireplace, masonry heater, or wood burning heater.

Information about District Rule 4901 can be found online at:
<https://ww2.valleyair.org/compliance/residential-wood-smoke-reduction-program/>

13h) Other District Rules and Regulations

Future development projects may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

14) Future Projects / Land Use Agency Referral Documents

Future development projects may require an environmental review and air emissions mitigation. A project's referral documents and environmental review documents provided to the District for review should include a project summary, the land use designation, project size, air emissions quantifications and impacts, and proximity to sensitive receptors and existing emission sources, and air emissions mitigation measures. For reference and guidance, more information can be found in the District's Guidance for Assessing and Mitigating Air Quality Impacts at:
<https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf>

If you have any questions or require further information, please contact Harout Sagherian by e-mail at Harout.Sagherian@valleyair.org or by phone at (559) 230-5860.

Sincerely,



Mark Montelongo
Director of Policy and Government Affairs