



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
7	Fresno Irrigation District	April 30, 2025
8	Fresno County	May 1, 2025

*For assistance with accessibility of this document,
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

Mx. Casey Lauderdale – West Area Neighborhoods Specific Plan

April 9, 2025

Page 2

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,



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.

<ul style="list-style-type: none"> • 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. 	<p>The Project will not include reduced parking requirements for residential uses.</p>
<p>At least 20 percent of the units included are affordable to lower-income residents</p>	<p>The Project will include affordable housing in line with the most recent Regional Housing Needs Assessment.</p>
<p>Results in no net loss of existing affordable units</p>	<p>The Project will not create a net loss of affordable housing.</p>
<p>Uses all electric appliances</p>	<p>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.</p>

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
Page 8

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

Page 5

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
Drainage Areas “AH”, “AI”, “AJ”, “AK”, “AL”, “AN”,
“CD”, “CG”, “CH”, “CI”, “EO”, “EJ”, “EM”, “EN”, “XX”
April 28, 2025
Page 2

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

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.

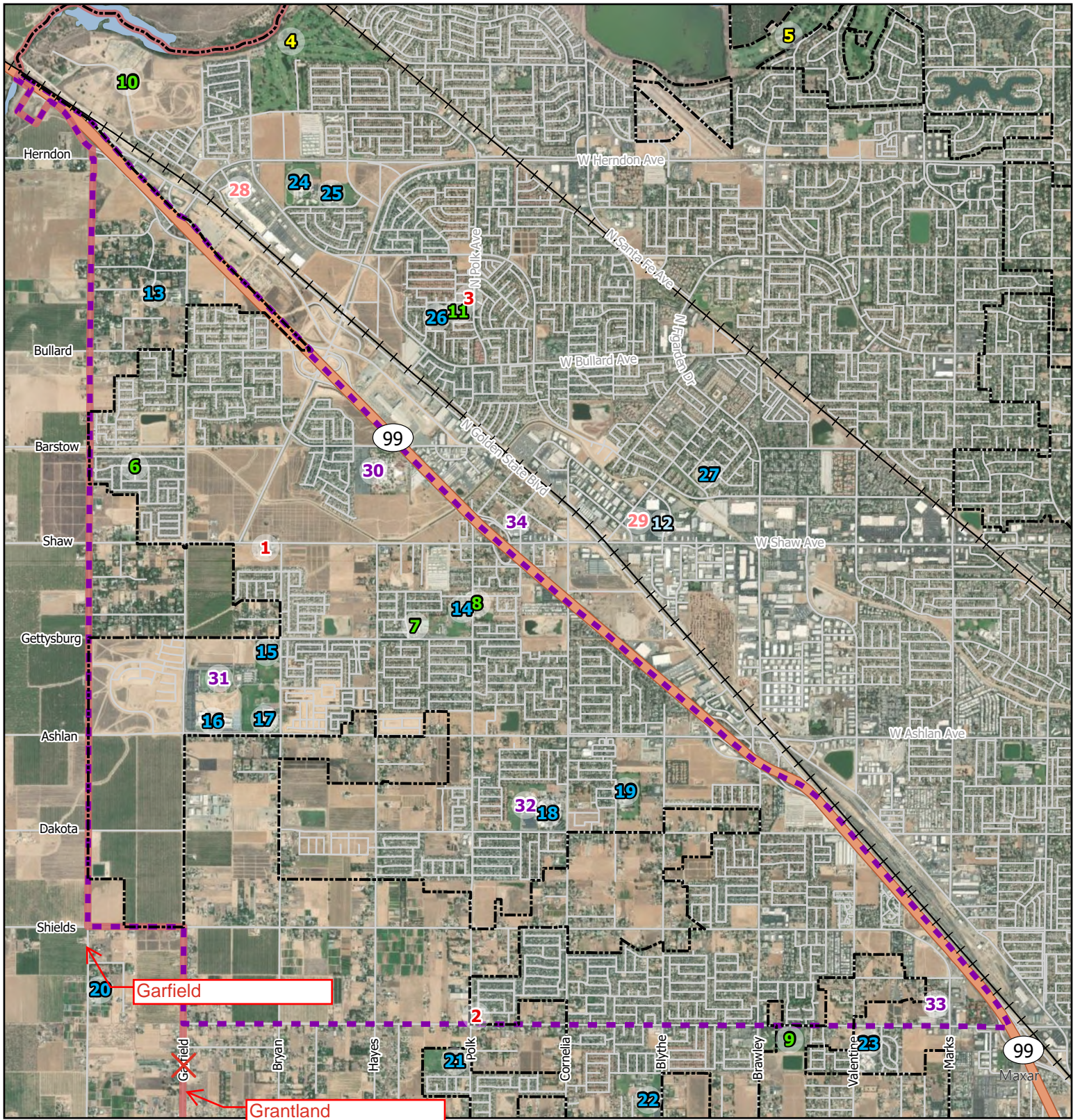
The evaluation of a project's effect on sensitive natural communities should encompass aquatic and wetland habitats. Consider "aquatic and wetland habitat" as examples of sensitive habitat.

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

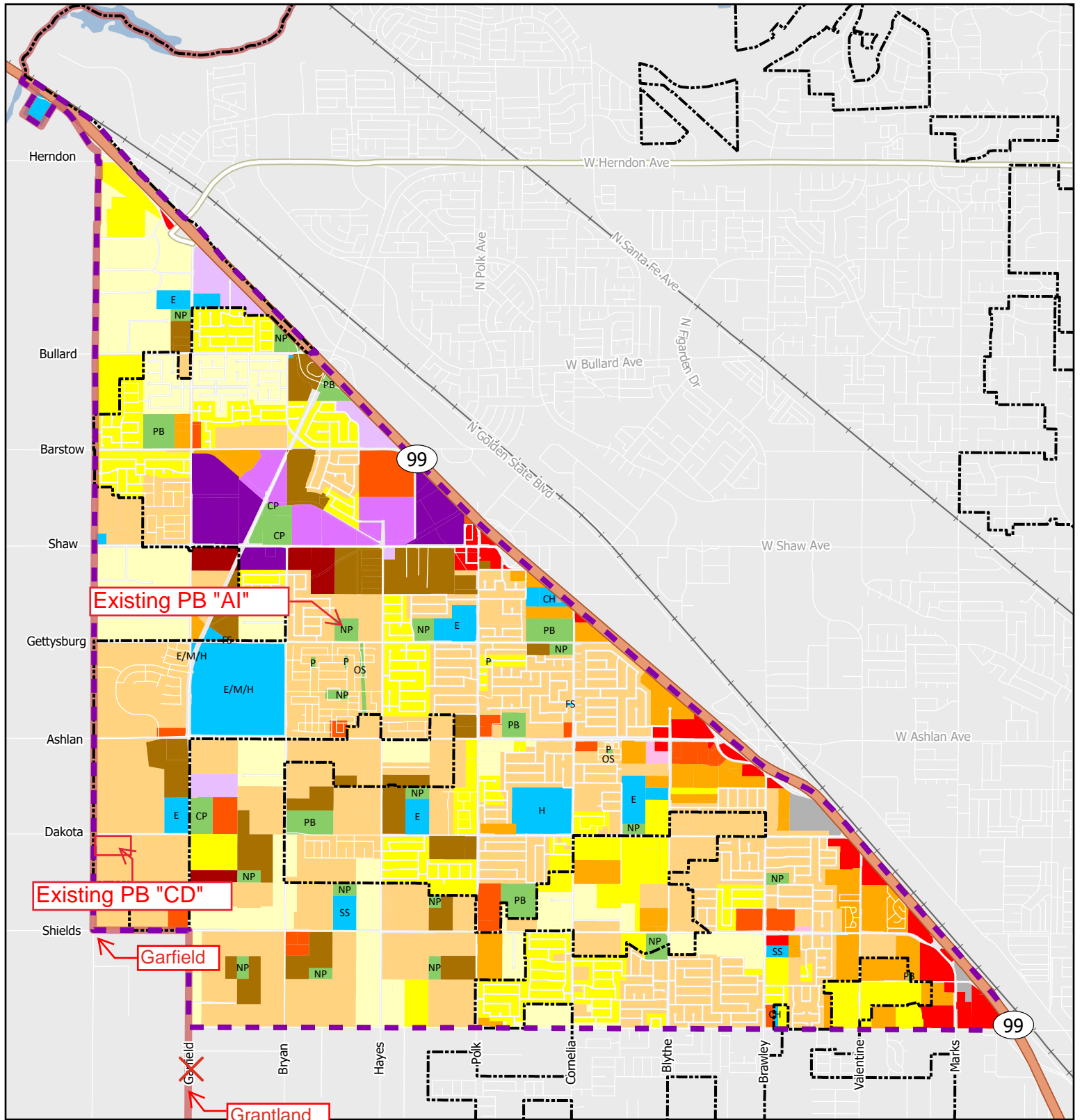
- Specific Plan
- Boundary
- Fresno City Limits
- Fresno Sphere of Influence

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

**CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN**

**FIGURE 2.0-3
Aerial View of Project**





CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 2.0-4.
Existing General Plan

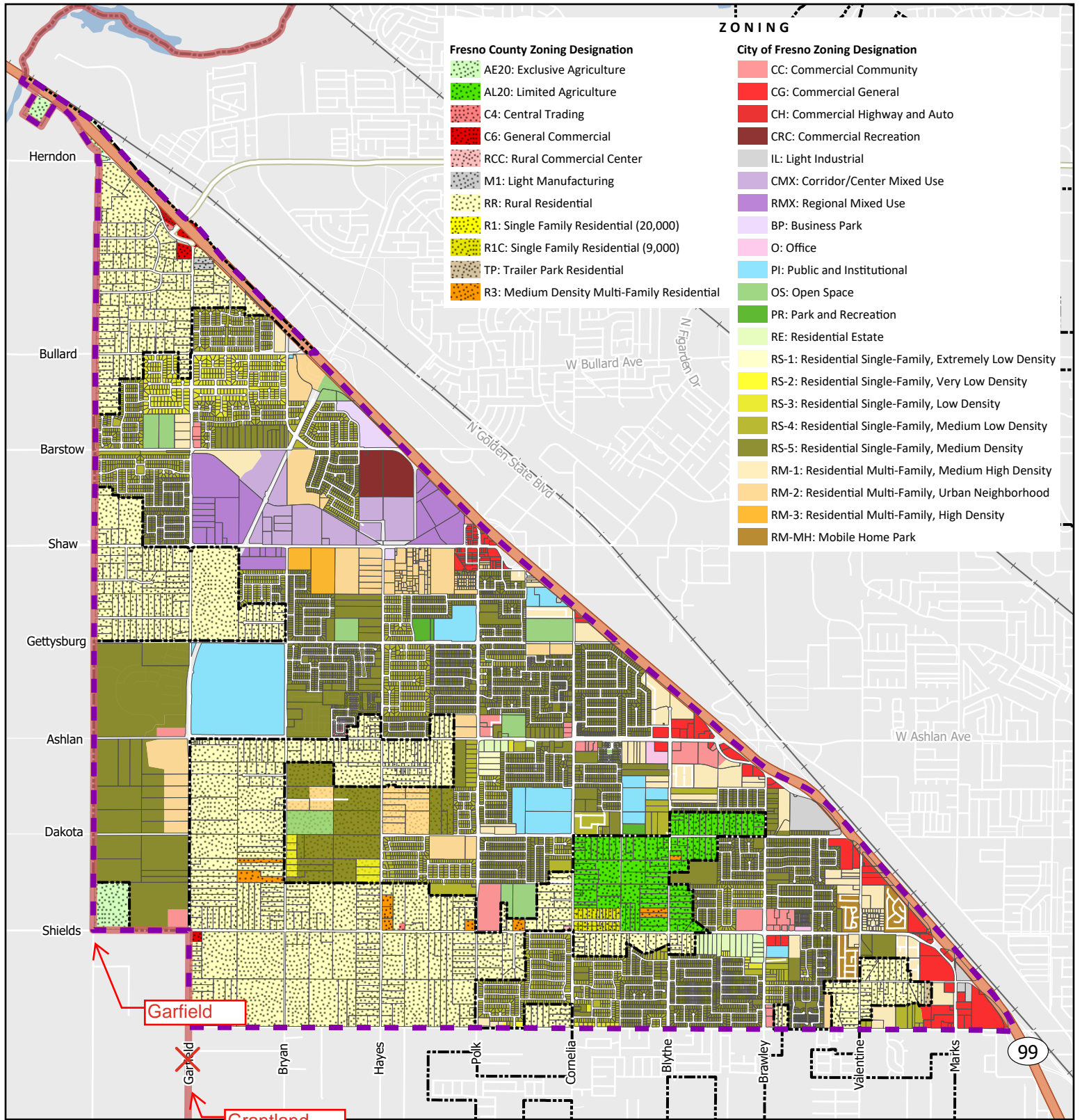
LEGEND

<ul style="list-style-type: none"> 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) 	<ul style="list-style-type: none"> COMMERCIAL Community Recreation General Regional EMPLOYMENT Office Business Park Light Industrial 	<ul style="list-style-type: none"> MIXED USE Neighborhood Mixed Use Corridor/Center Mixed Use Regional Mixed Use PUBLIC FACILITIES Public Facilities <i>Church (CH) -- Fire Station (FS) -- Special School (SS)</i> <i>Elementary School (E) -- High School (H)</i> <i>Elementary/Middle/High School (E/M/H)</i> OPEN SPACE Open Space <i>Community Park (CP) -- Neighborhood Park (NP)</i> <i>Ponding Basin (PB) -- Open Space (OS) -- Park (P)</i>
--	--	---

0 1/4 1/2
Miles

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

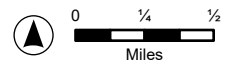
Source: City of Fresno. Map date: December 15, 2023.



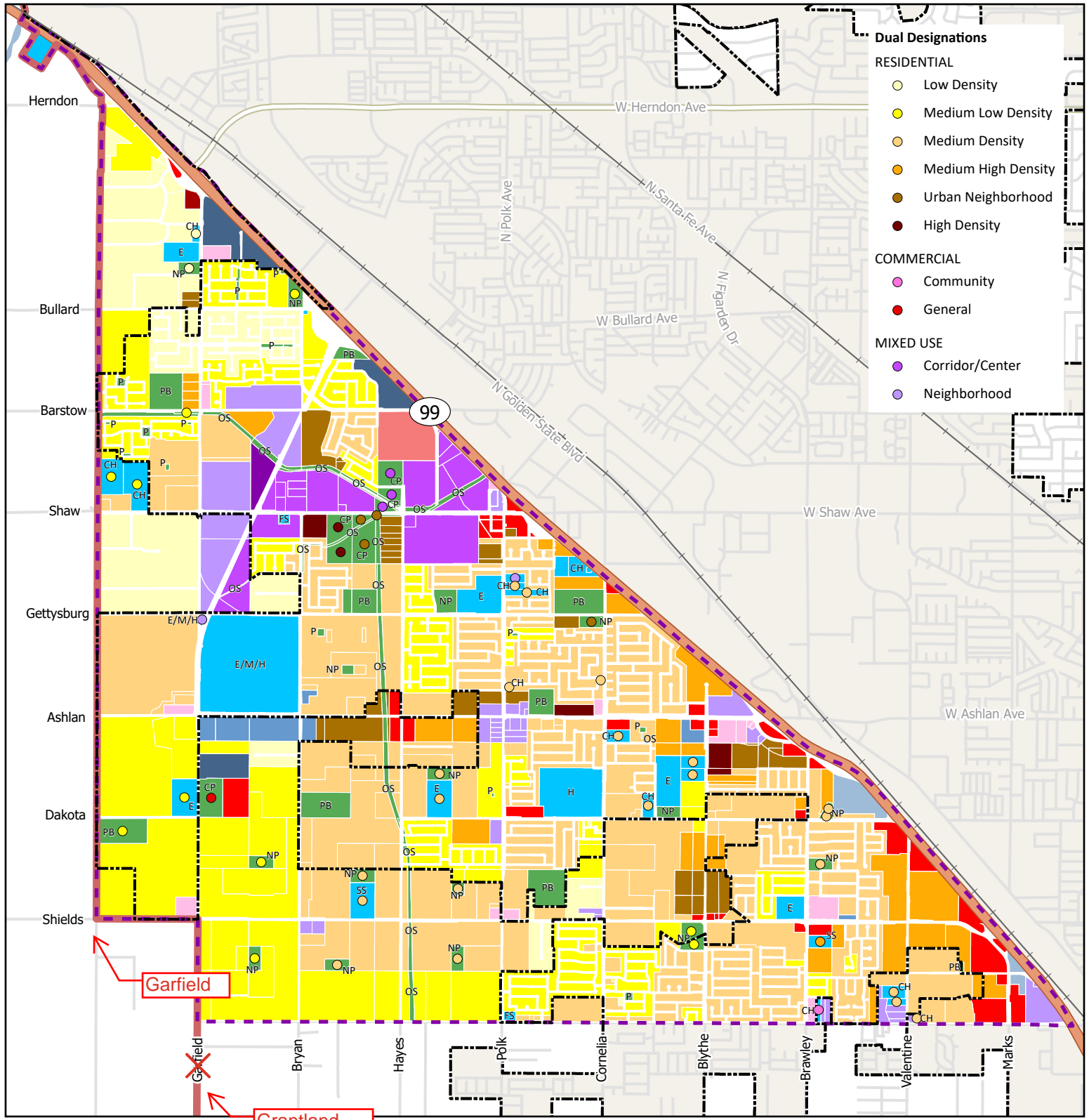
- LEGEND**
- Specific Plan Boundary
 - Fresno City Limits
 - Fresno Sphere of Influence

**CITY OF FRESNO
WEST AREA NEIGHBORHOOD SPECIFIC PLAN**

**FIGURE 2.0-5.
Existing Zoning Designations**



Source: City of Fresno; County of Fresno. Map date: January 16, 2025.



- Dual Designations**
- RESIDENTIAL**
- Low Density
 - Medium Low Density
 - Medium Density
 - Medium High Density
 - Urban Neighborhood
 - High Density
- COMMERCIAL**
- Community
 - General
- MIXED USE**
- Corridor/Center
 - Neighborhood

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)

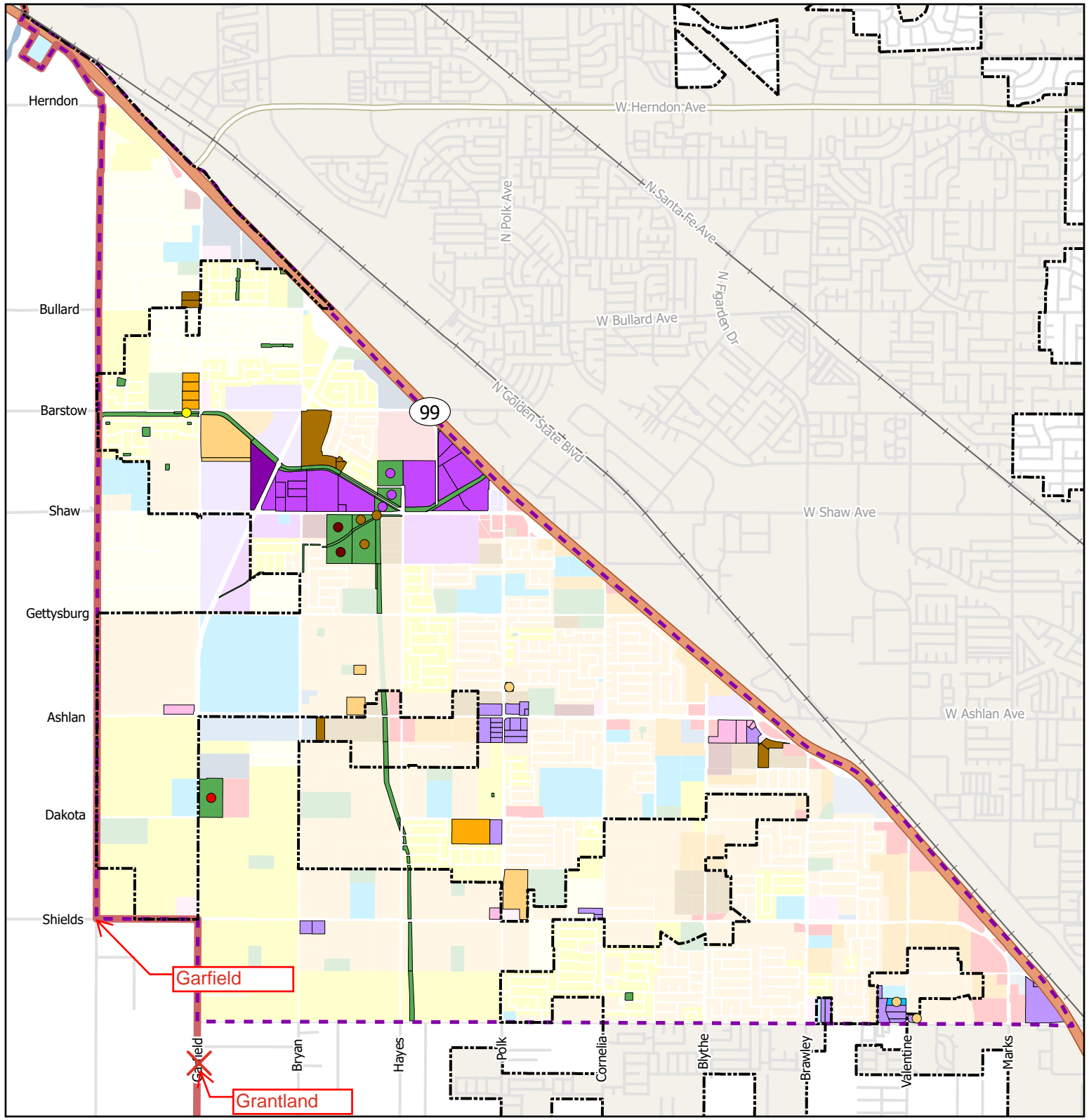
**CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN**

FIGURE 2.0-6.

**Proposed Specific Plan Land Uses
and Dual Designations**



Source: City of Fresno. Map date: November 17, 2023



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



Source: City of Fresno. Map date: November 17, 2023

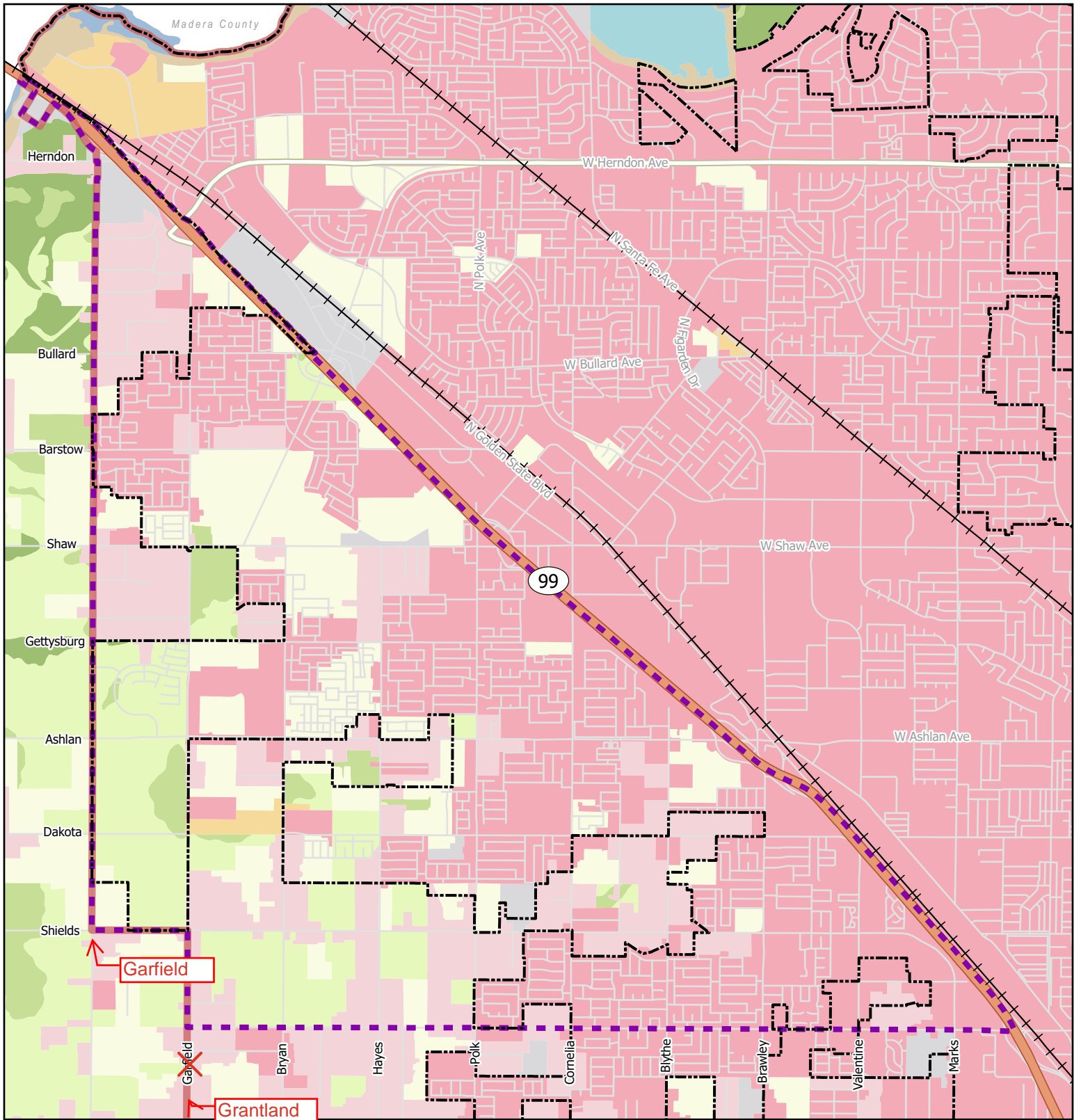













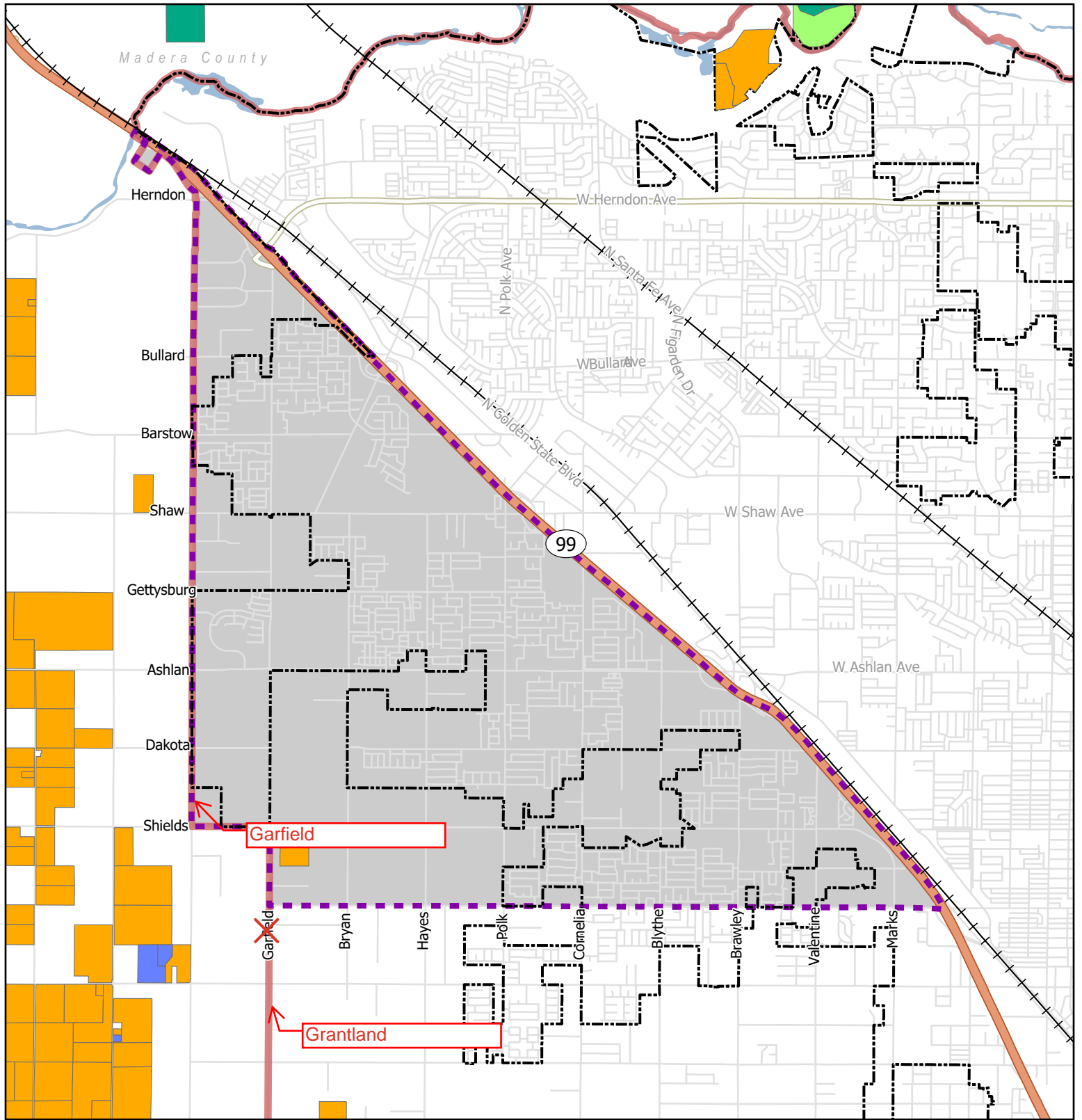


FIGURE 3.2-1.
Farmland Classifications

LEGEND

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








CITY OF FRESNO
WEST AREA NEIGHBORHOOD SPECIFIC PLAN

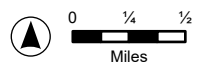
FIGURE 3.2-2.
Williamson Act Lands

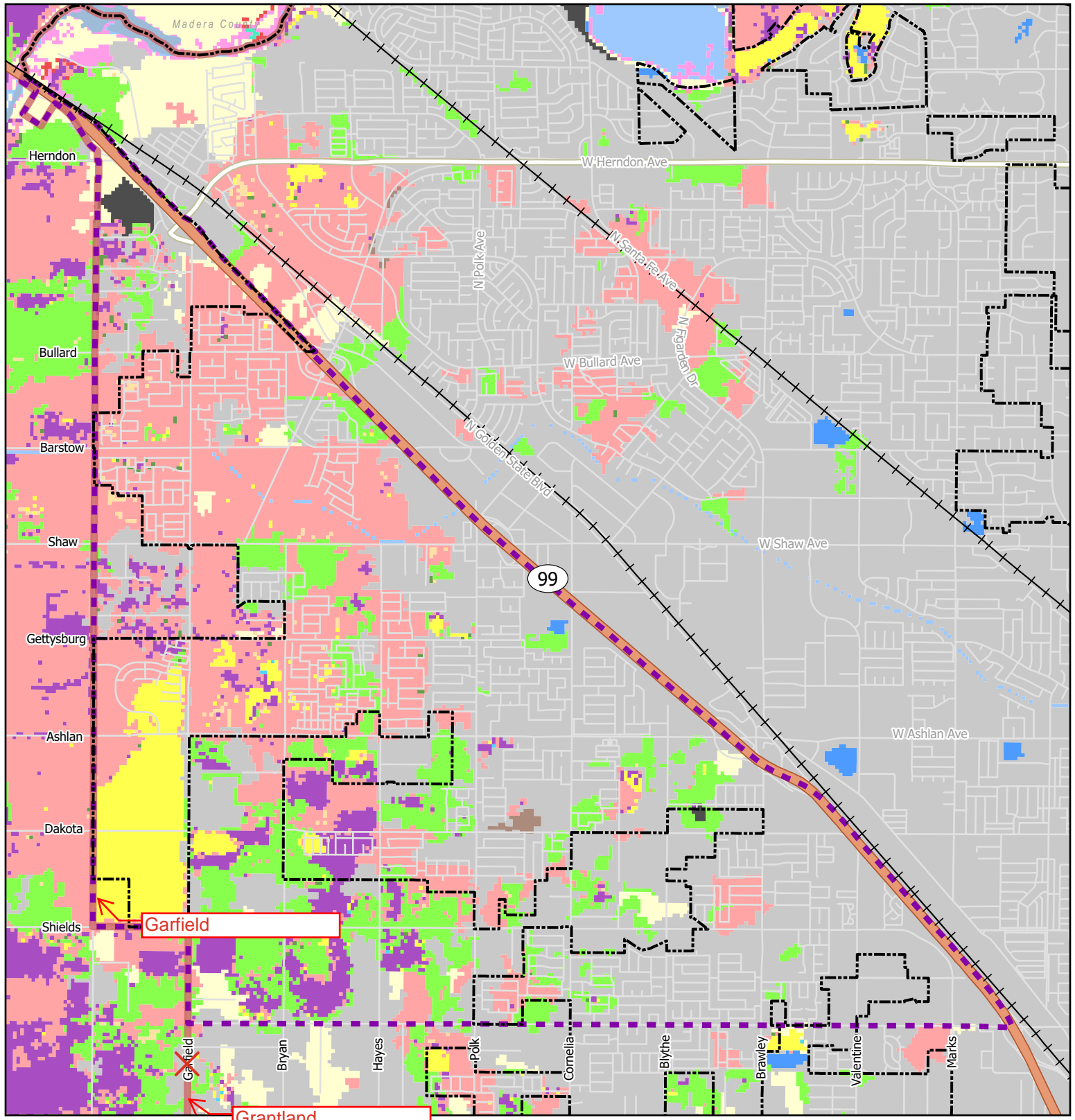
LEGEND

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




















Williamson Act Enrollment Type

-  Prime
-  Nonprime
-  Mixed
-  Nonrenewal



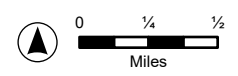


LEGEND

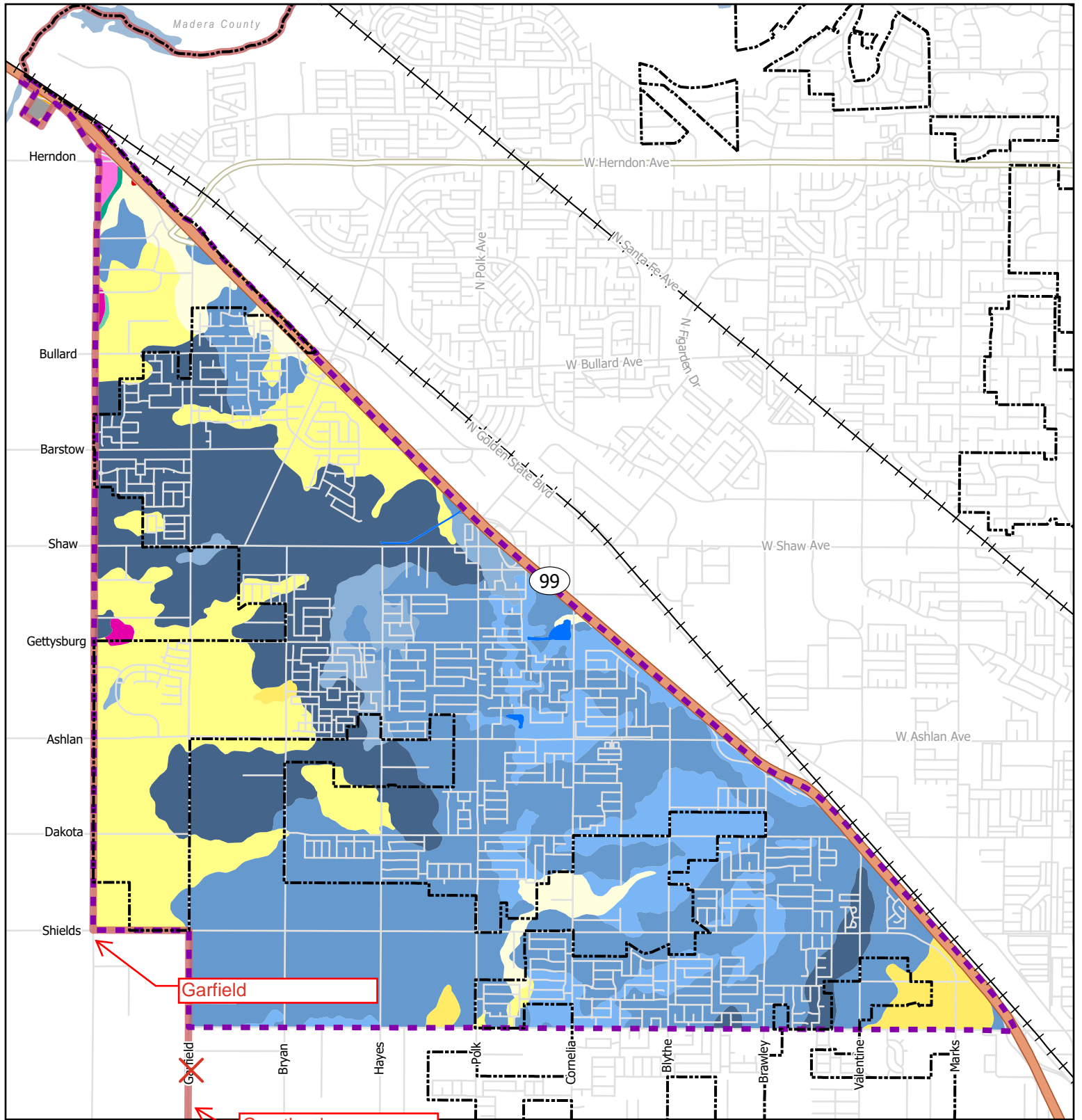
-  Specific Plan Boundary
-  Fresno City Limits
-  Fresno Sphere of Influence
-  Annual Grassland
-  Barren
-  Deciduous Orchard
-  Dryland Grain Crops
-  Eucalyptus
-  Evergreen Orchard
-  Fresh Emergent Wetland
-  Irrigated Grain Crops
-  Irrigated Hayfield
-  Irrigated Row and Field Crops
-  Lacustrine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

CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 3.4-1.
Land Cover Types



Source: CAL FIRE FVEG15_1, 2015; City of Fresno. Map date: January 5, 2024



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

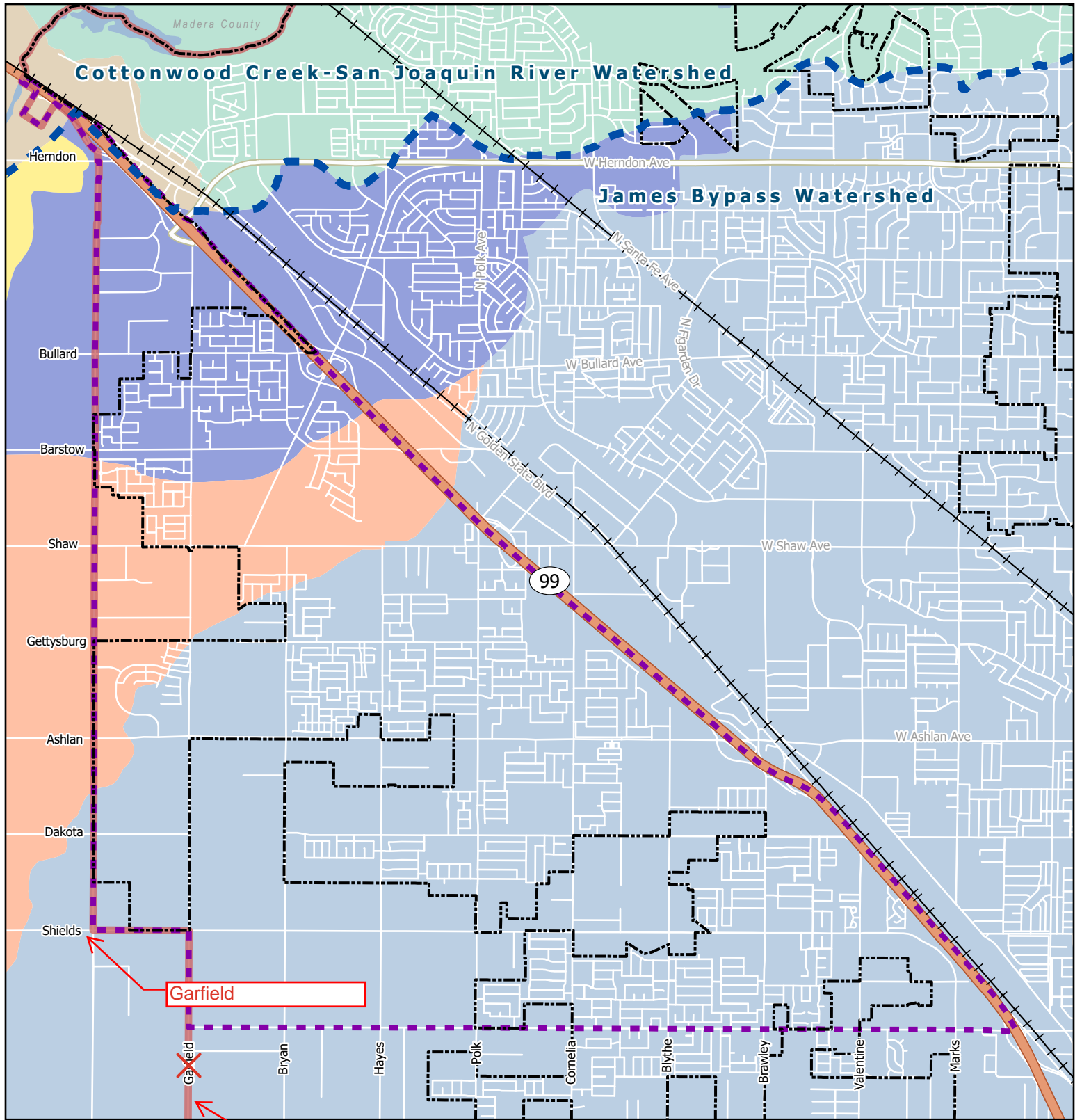
- San Joaquin loam**
- San Joaquin loam, 0-3% slopes
- San Joaquin loam, shallow, 0-3% slopes
- San Joaquin sandy loam, shallow, 0-3% slopes
- San Joaquin sandy loam, 0-3%, MLRA 17
- Other soil types**
- Pits
- Terrace escarpments
- Water

**CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN**

**FIGURE 3.6-1.
Soil Types**



Source: USA Soils; City of Fresno. Map date: January 5, 2024



LEGEND

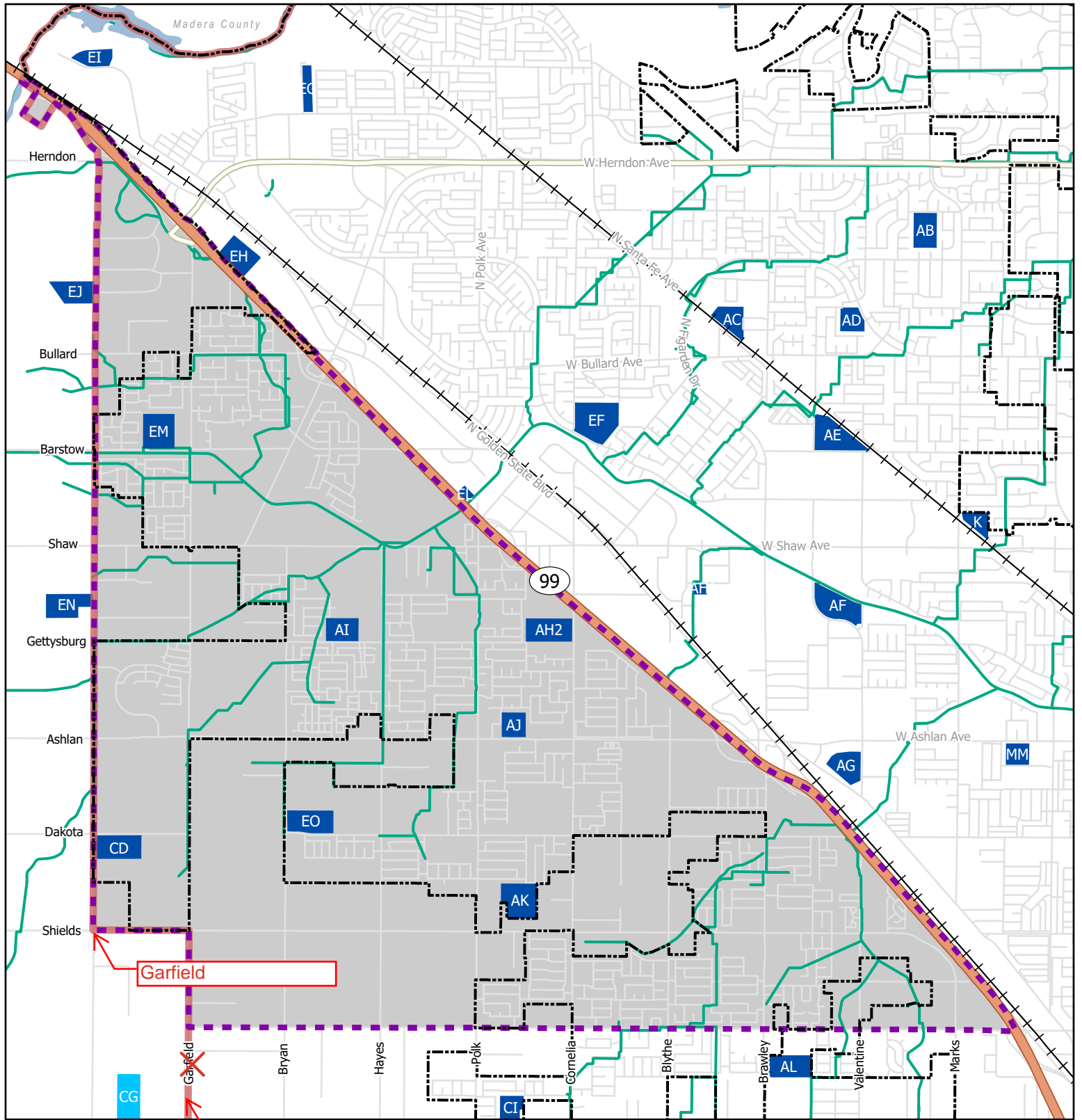
- Specific Plan Boundary
- Fresno City Limits
- Fresno Sphere of Influence
- Watershed Boundary (HUC 10)

- 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**





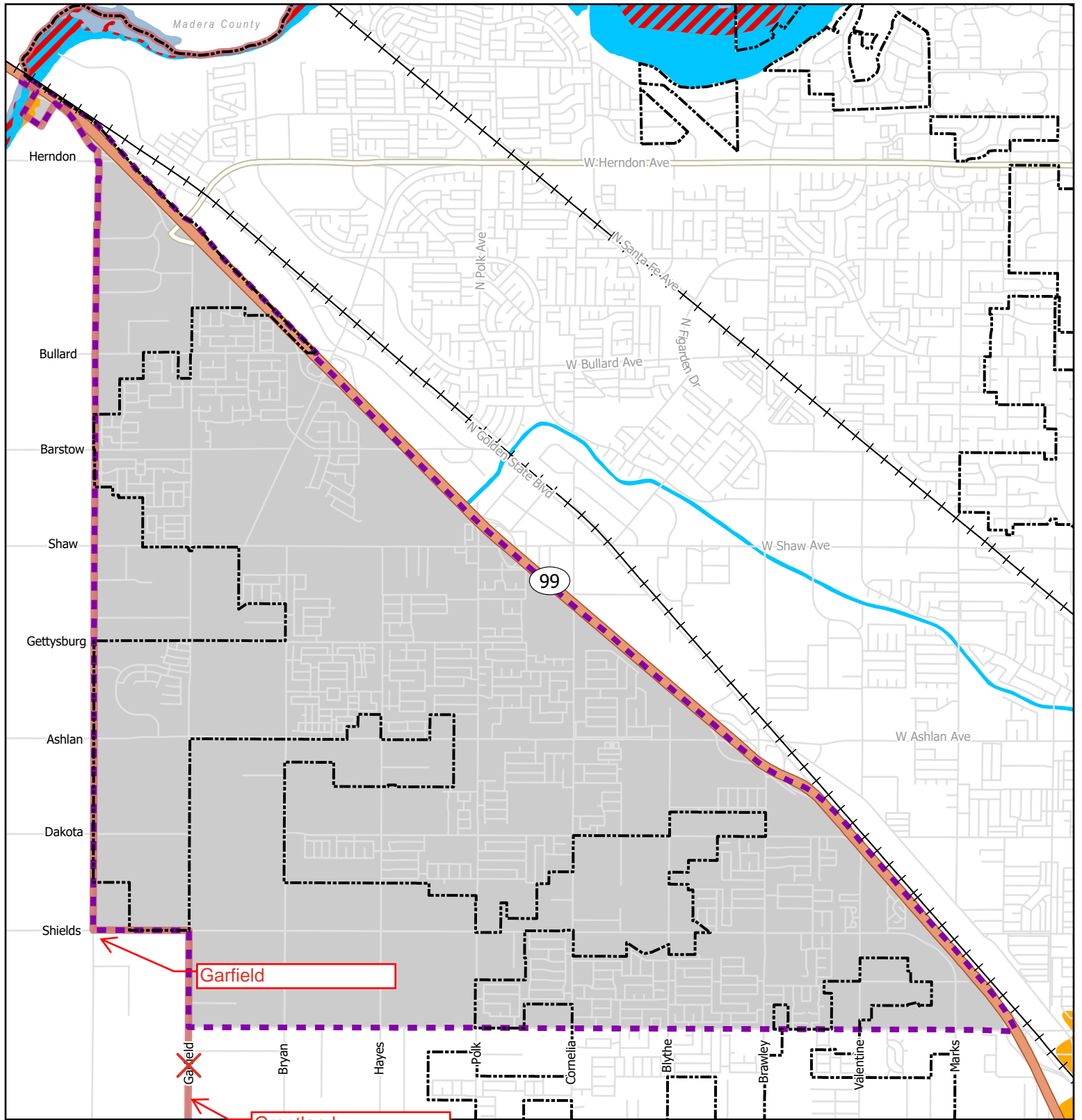
LEGEND

- 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

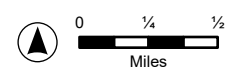




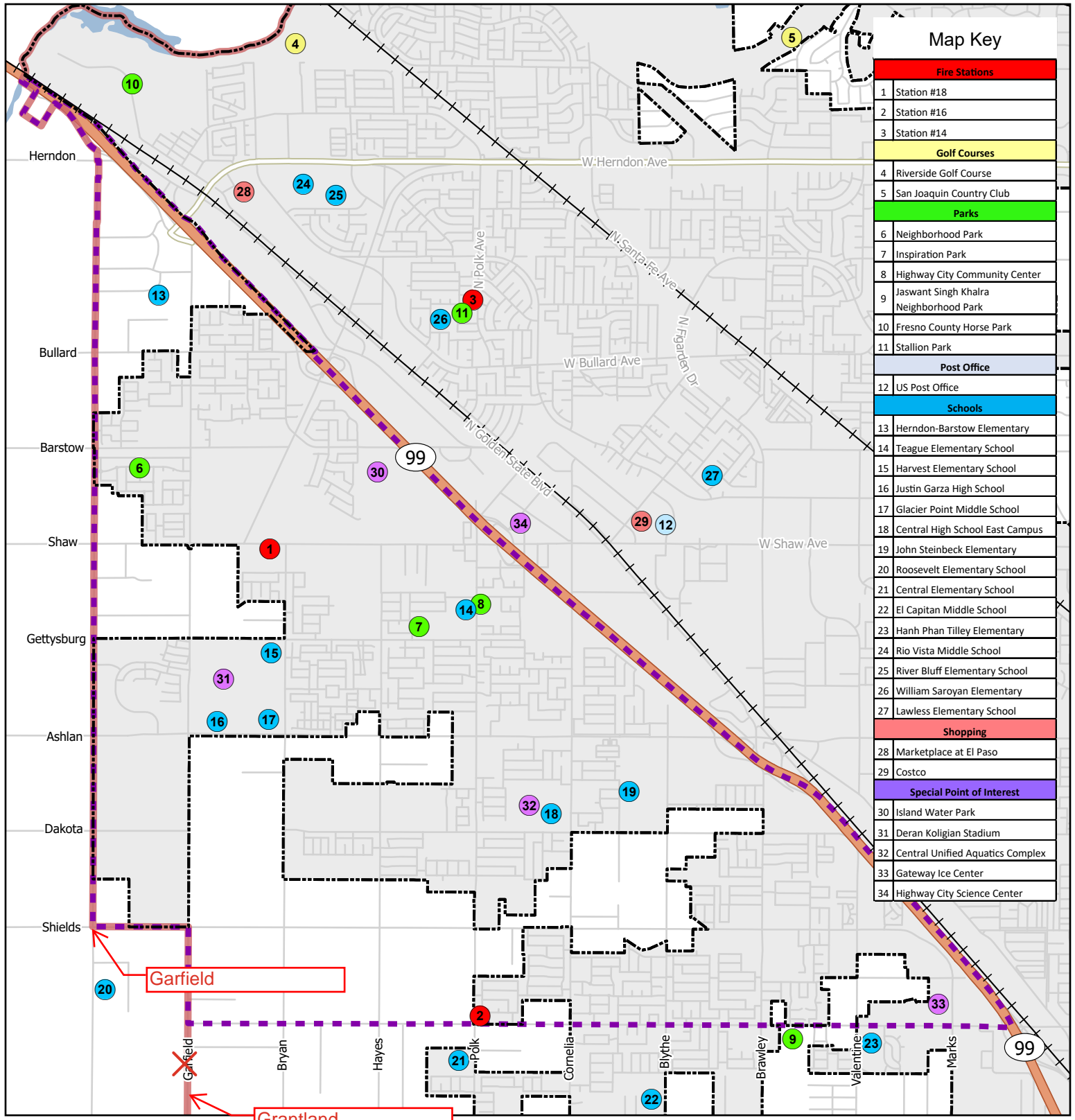
- LEGEND**
- Specific Plan Boundary
 - Fresno City Limits
 - Fresno Sphere of Influence
 - 100-year Flood Zone
 - Regulatory Floodway
 - 500-year Flood Zone
 - Area of Minimal Flood Hazard

CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 3.9-3.
FEMA Flood Zone Map



Source: FEMA National Flood Hazard Layer; City of Fresno. Map date: January 5, 2024



Map Key

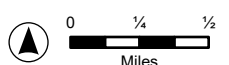
Fire Stations	
1	Station #18
2	Station #16
3	Station #14
Golf Courses	
4	Riverside Golf Course
5	San Joaquin Country Club
Parks	
6	Neighborhood Park
7	Inspiration Park
8	Highway City Community Center
9	Jaswant Singh Khalra Neighborhood Park
10	Fresno County Horse Park
11	Stallion Park
Post Office	
12	US Post Office
Schools	
13	Herndon-Barstow Elementary
14	Teague Elementary School
15	Harvest Elementary School
16	Justin Garza High School
17	Glacier Point Middle School
18	Central High School East Campus
19	John Steinbeck Elementary
20	Roosevelt Elementary School
21	Central Elementary School
22	El Capitan Middle School
23	Hanh Phan Tilley Elementary
24	Rio Vista Middle School
25	River Bluff Elementary School
26	William Saroyan Elementary
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

LEGEND

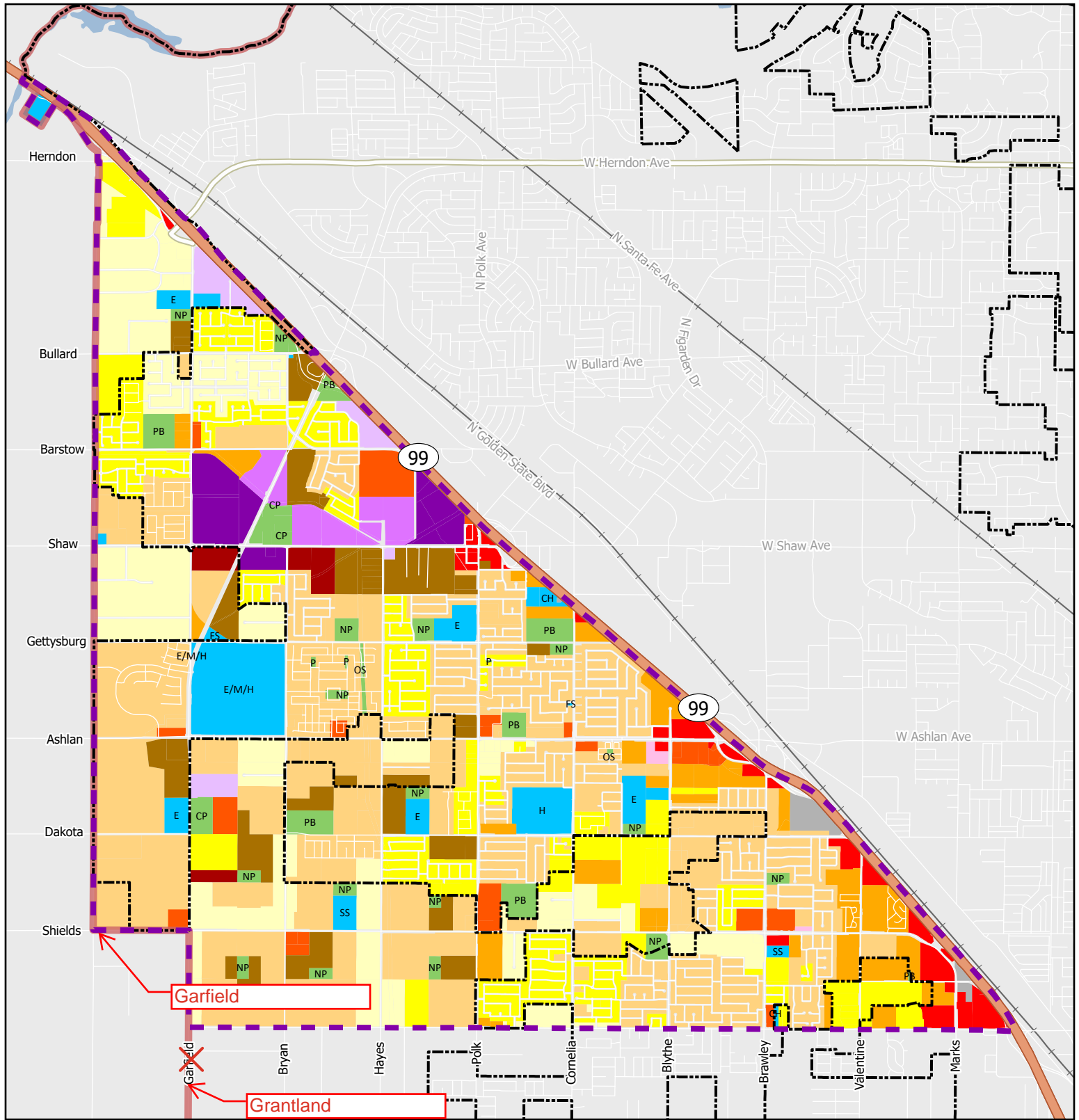
Specific Plan Boundary	Park
Fresno City Limits	Post Office
Fresno Sphere of Influence	School
Fire Station	Shopping
Golf Course	Special Point of Interest

CITY OF FRESNO
WEST AREA NEIGHBORHOODS SPECIFIC PLAN

FIGURE 3.13-1.
Public Facilities



Source: City of Fresno. Map date: January 22, 2024



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)

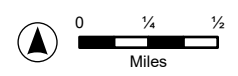
- COMMERCIAL**
- Community
- Recreation
- General
- Regional
- EMPLOYMENT**
- Office
- Business Park
- Light Industrial

- 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)*

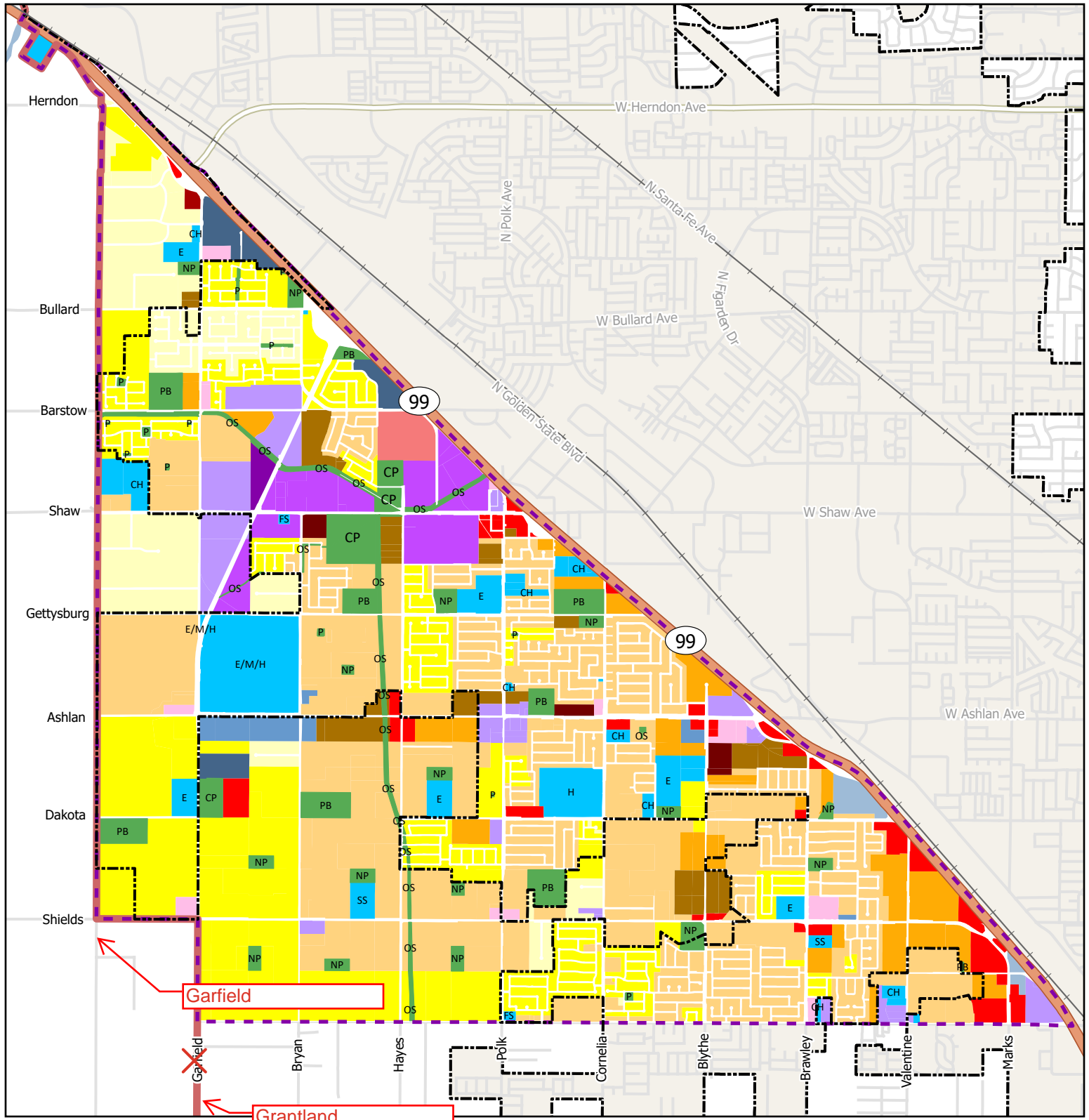
**CITY OF FRESNO
WEST AREA NEIGHBORHOOD SPECIFIC PLAN**

FIGURE 5.0-2.

No Project Alternative



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



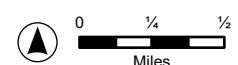
LEGEND

- Specific Plan Boundary
- Fresno City Limits
- Fresno Sphere of Influence
- RESIDENTIAL**
- Low Density (1-3.5 D.U./acre)
- 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

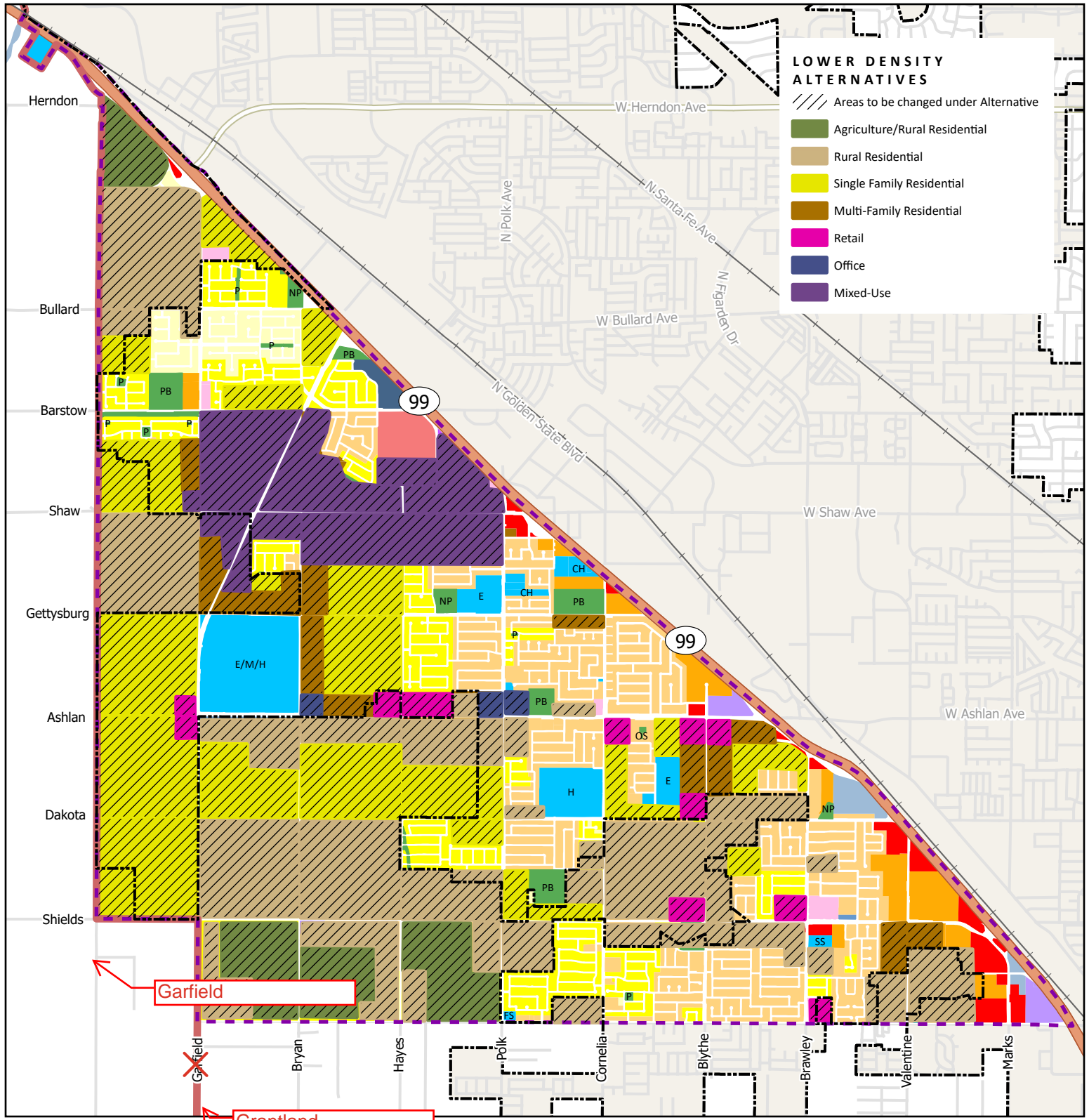
- MIXED USE**
- Neighborhood Mixed Use
- Corridor/Center Mixed Use
- Regional Mixed Use
- PUBLIC FACILITIES**
- Public Facilities
- Church (CH) -- Fire Station (FS) -- Special School (SS)*
- Elementary School (E) -- High School (H)*
- Elementary/Middle/High School (E/M/H)*
- OPEN SPACE**
- Open Space
- Community Park (CP) -- Neighborhood Park (NP)*
- Ponding Basin (PB) -- Open Space (OS) -- Park (P)*

CITY OF FRESNO
WEST AREA NEIGHBORHOOD SPECIFIC PLAN

FIGURE 5.0-3.
Community Parks Alternative



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



LOWER DENSITY ALTERNATIVES

//// Areas to be changed under Alternative

- Agriculture/Rural Residential
- Rural Residential
- Single Family Residential
- Multi-Family Residential
- Retail
- Office
- Mixed-Use

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

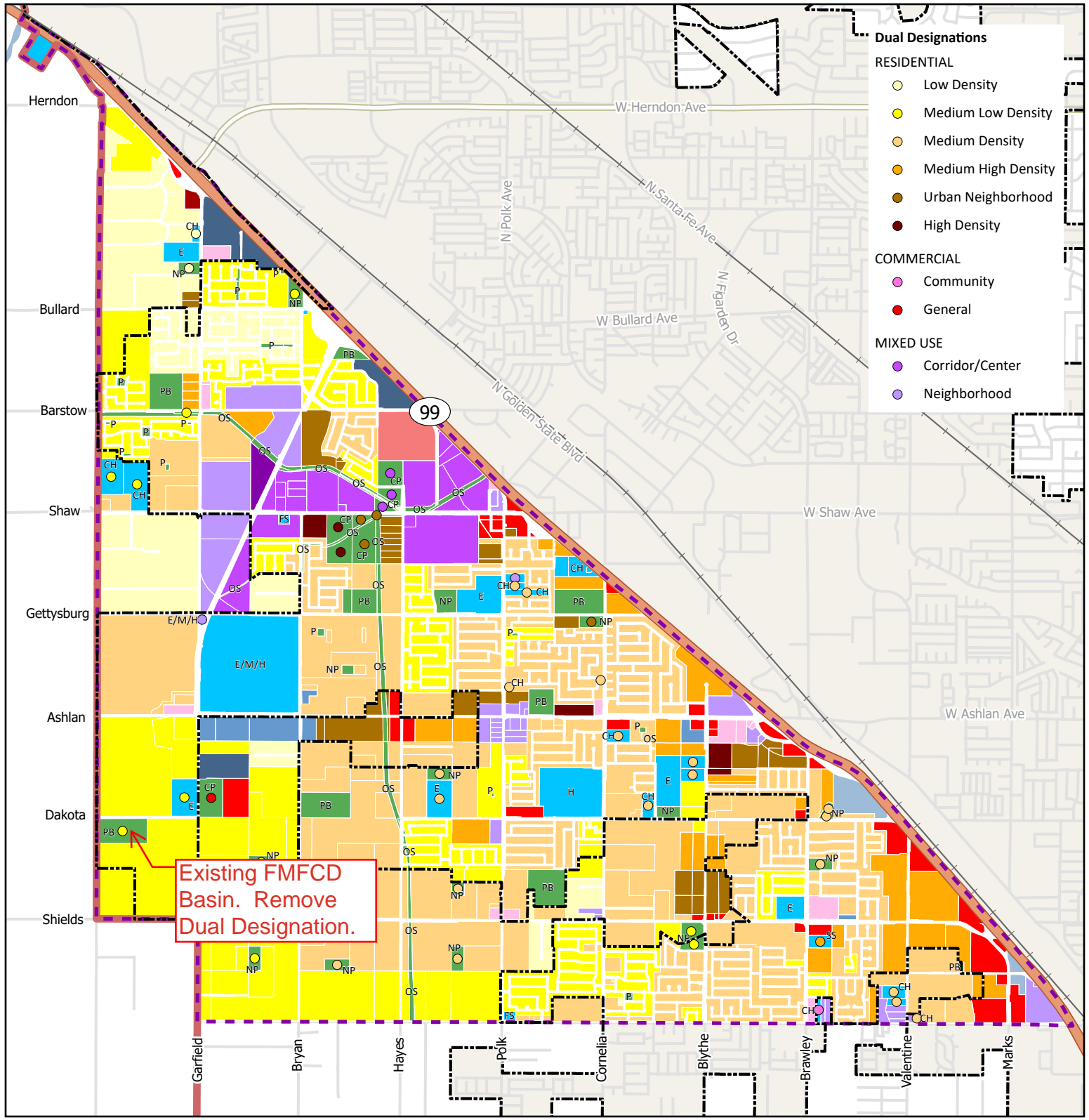
*Community Park (CP) -- Neighborhood Park (NP)
Ponding Basin (PB) -- Open Space (OS) -- Park (P)*

**CITY OF FRESNO
WEST AREA NEIGHBORHOOD SPECIFIC PLAN**

**FIGURE 5.0-4.
Lower Density Alternative**



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



- Dual Designations**
- RESIDENTIAL**
- Low Density
 - Medium Low Density
 - Medium Density
 - Medium High Density
 - Urban Neighborhood
 - High Density
- COMMERCIAL**
- Community
 - General
- MIXED USE**
- Corridor/Center
 - Neighborhood

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 2.0-6.

Proposed Specific Plan Land Uses and Dual Designations



Source: City of Fresno. Map date: November 17, 2023

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.

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.

Update: Figure not included in RDEIR

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 updates its hydraulic model for flood control and prepares a capital improvement program every year with projected funding for five years. Surface runoff from development sites is managed through 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.

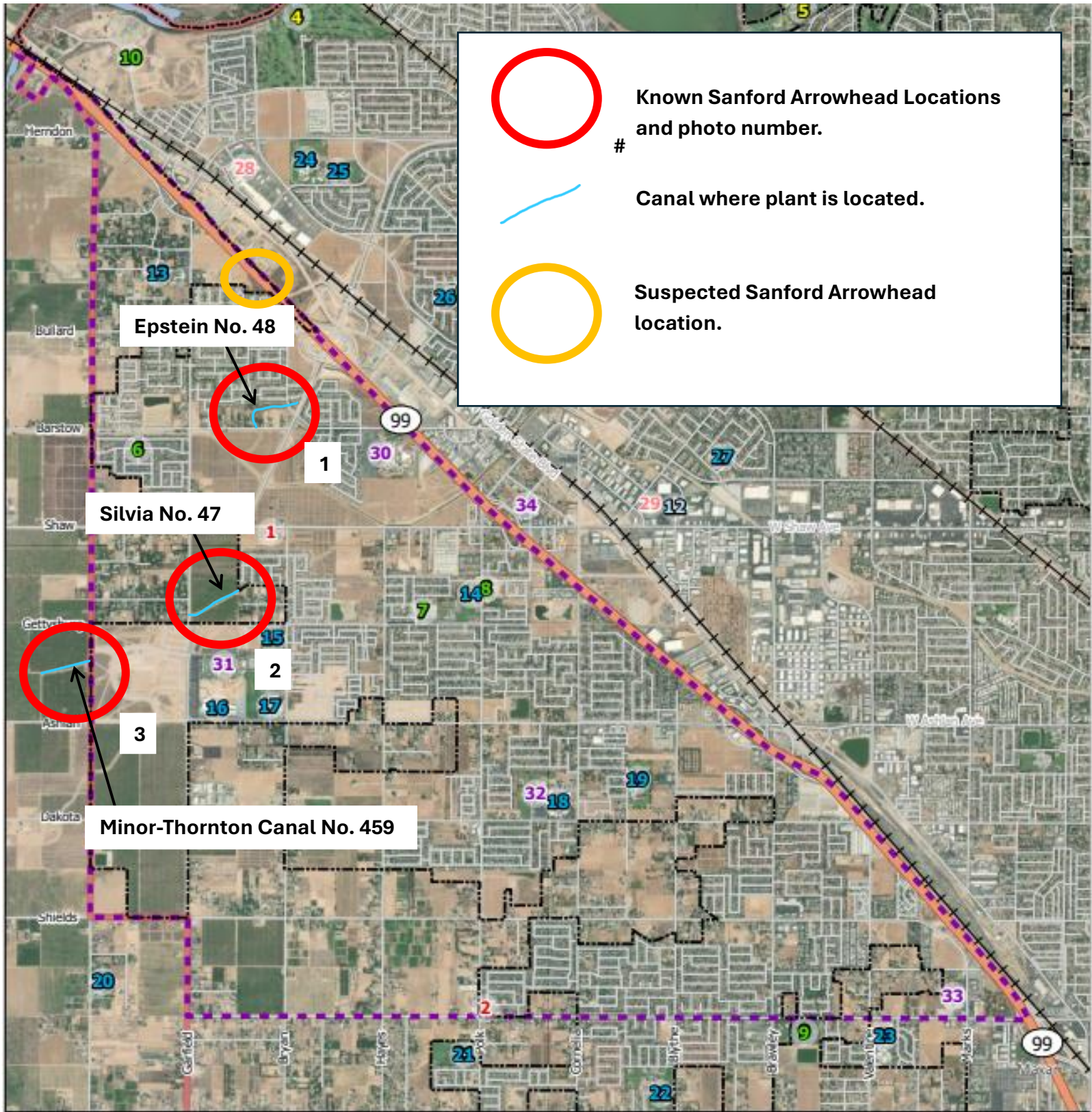
Recommendation: Require plant surveys whenever irrigation canals will be filled, cleaned, or disturbed by construction or maintenance activity as a result of a proposed project. Then implement the rest of this mitigation measure which includes contacting CNPS.

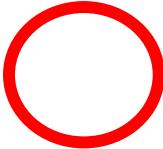

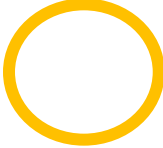
I should note that Photo 3 is outside of the specific plan area, but I imagine that the canal may be altered in connection to future development.

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



 Known Sanford Arrowhead Locations and photo number. #
 Canal where plant is located.
 Suspected Sanford Arrowhead location.

Epstein No. 48

1

Silvia No. 47

2

3

Minor-Thornton Canal No. 459



06/10/24

12:00

Sanford Arrowhead plants

1



Sanford Arrowhead plant

08/26/20
19:43

2

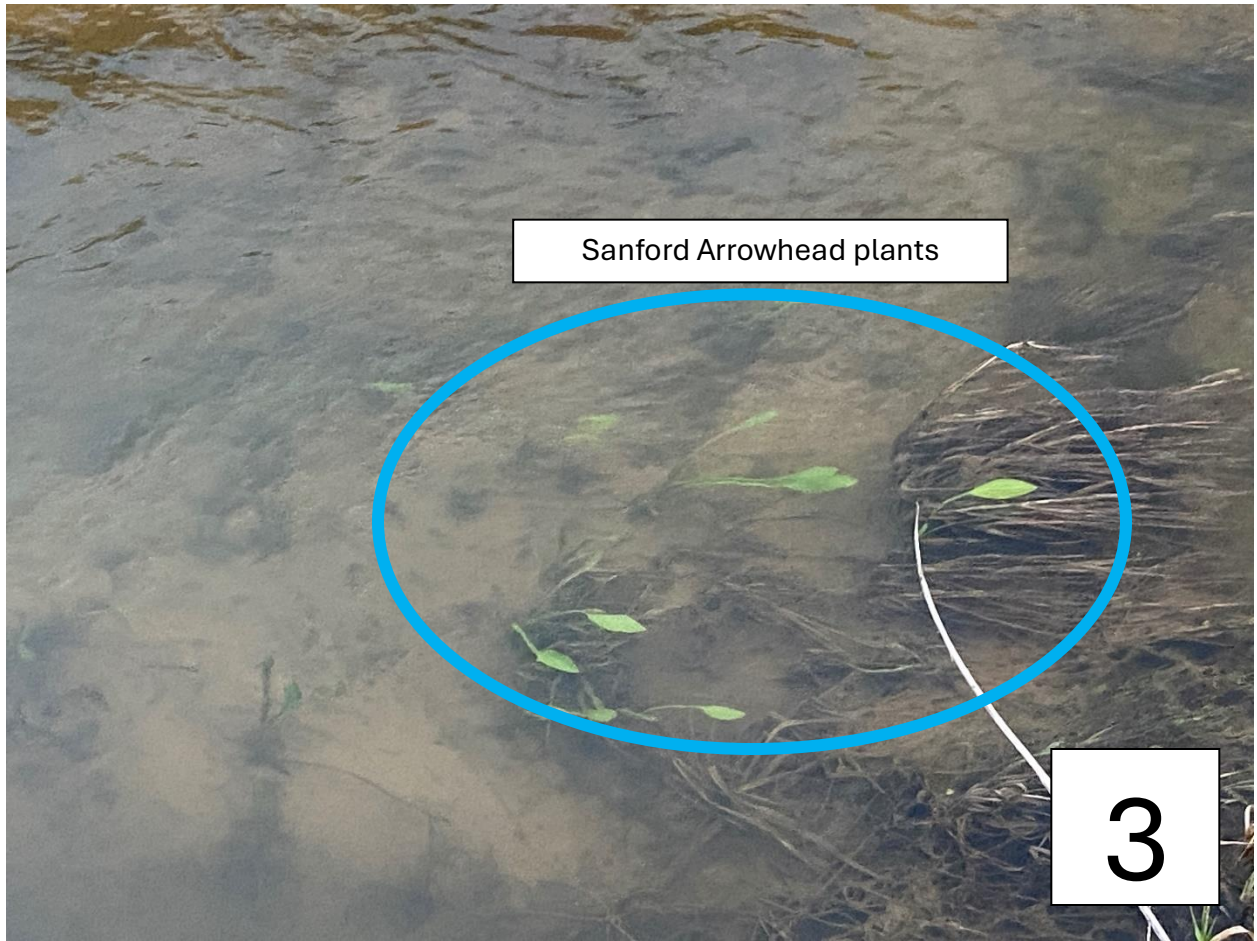


04/14/25
19:30



04/14/25

19:30



Sanford Arrowhead plants

3

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 PM2.5 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 PM2.5 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	10,000 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



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

CONVEYANCE. COMMITMENT. CUSTOMER SERVICE.

April 30, 2025

Casey Lauderdale
Planning and Development Department
City of Fresno
2600 Fresno Street, Third Floor
Fresno, CA 93721

RE: Fresno West Area Specific Plan Recirculated Draft Program Environmental
Impact Report for the City of Fresno
FID Facilities: Various

Dear Ms. Lauderdale:

The Fresno Irrigation District (FID) has reviewed the Fresno West Area Specific Plan Recirculated Draft Program Environmental Impact Report for the City of Fresno . FID has the following comments:

1. FID previously reviewed and commented on the subject documents on March 28, 2022 as Notice of Available West Area Neighborhood Specific Plan and on July 26, 2019, as City of Fresno West Area Specific Plan Notice of Preparation. Those comments and conditions still apply and a copy has been attached for your review.

FID has the following additional comments:

Water Supply Impact

1. The document acknowledges that the maximum percentage of FID surface water supply that the City can obtain is 29 percent under the Cooperative Agreement between the City of Fresno and FID. The City's service area is expected to surpass 29 percent of FID's service area between 2025 and 2030. If the City of Fresno exceeds 29 percent prior to full development within the West Area Specific Plan, the document must consider how to address future development based on water consumption beyond the limits of the agreement and evaluate the potential impacts.
2. The document must consider whether the City's Water Master Plan that is

G:\Agencies\FresnoCity\EIR\DEIR West Area Specific Plan\2025\Recirculated Draft EIR - West Area Neighbrrhoods Specific Plan EIR.doc

BOARD OF DIRECTORS

President RYAN JACOBSEN Vice-President JERRY PRIETO, JR. CHRISTOPHER WOLF
GEORGE PORTER GREGORY BEBERIAN General Manager BILL STRETCH

currently being updated may impact the developments within the Planning Area. The report must consider and evaluate the City's growth within the planning area and any other concerns including climate change, and whether the City's Water Master Plan can still provide the necessary guidance for the City.

3. The City of Fresno has implemented many of the projects previously proposed in the City's Water Master Plan. The Proposed document should consider and evaluated whether the constructed projects have resulted in benefits that were anticipated.
4. The proposed land use (or changes in land use) should be such that the need for water is minimized and/or reduced so that groundwater impacts to the proposed project area and any surrounding areas are eliminated.
5. If treated surface water is used and the City has a deficit water supply or groundwater levels continue to drop, the City must acquire additional water from a water purveyor, such as FID for that purpose, so as to not impact water supplies to or create greater water supply deficits in other areas of the City or in the groundwater basin. Water supply issues must be resolved before any further "hardening" of the water supply demand is allowed to take place.
6. The potential for increase in water consumption by the project will result in additional groundwater overdraft. There is a significant cone of depression beneath the City of Fresno. FID is concerned that the increased water demand due to a change in land use may have a significant impact to the groundwater quantity and/or quality underneath the City of Fresno, FID and the Kings Groundwater Sub-basin. The "demand" side of water consumed needs to be evaluated or scrutinized as much as the "supply" side of the water supply. Many of the areas are historically native, and/or rural residential with minimal to no water use. Under current circumstances the project area is experiencing a modest but continuing groundwater overdraft. Should the proposed project result in a significant increase in dependence on groundwater, this deficit will increase. FID recommends the City of Fresno require proposed projects balance anticipated groundwater use with sufficient recharge of imported surface water in order to preclude increasing the area's existing groundwater overdraft problem.

Comments on specific sections:

Hydrology and Water Quality

1. The West Area Neighborhood Specific Plan requires routing of stormwater through several conveyance facilities through the Plan Area. FMFCD will need to update its Storm Drainage and Flood Control Master Plan for the Plan Area. FMFCD will be required to convey discharges to FID's larger canals where

capacity constraints are not an issue. The City of Fresno will need to consider this with its Mitigation Measures and the design of stormwater detention basins and expanded capacity for stormwater.

2. Policy RC-6-i Natural Recharge. While FID appreciates the support of the City to remove unnecessary concrete from its existing canals, FID encourages a policy revision to ensure alignment with FID policies, procedures and practices, preventing any conflicts that could impact implementation. FID utilizes concrete lining for many reasons and purposes; therefore a coordinated approach will help achieve the best outcome for all parties.
3. The City of Fresno should consider acquiring property and constructing City-owned recharge basins to increase groundwater recharge in the Plan Area or look at other drainage facilities which might better align with the Natural Recharge Policy than the use of FID facilities.
4. The City of Fresno will also need to take into consideration Trails over FID Pipelines and Easements. City of Fresno and FID joint-use agreements, common-use agreements or encroachment agreements must not restrict or impair FID's ability to maintain and operate its facilities unless all impacts can be fully mitigated.

Thank you for making available to us the Fresno West Area Neighborhoods Specific Plan Recirculated Draft Program Environmental Impact Report for our review and allowing us the opportunity to provide comments. We appreciate the opportunity to comment on the subject documents. While it is difficult to envision all of the potential impacts without all of the improvement details and impact report, we have attempted to provide you with as much information as possible. We reserve the right to provide additional comments as the Plan Area develops and/or when more detailed information becomes available. If you have any questions, please feel free to contact me Laurence Kimura at (559) 233-7161 extension 7103 or LKimura@fresnoirrigation.com.

Sincerely,



Laurence Kimura, P.E.
Chief Engineer

Attachments

Due
4/28

Notice of Availability

Fresno West Area Neighborhoods Specific Plan Recirculated Draft Environmental Impact Report

LEAD AGENCY:

City of Fresno Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
(559) 621-8003

EIR CONSULTANT:

De Novo Planning Group
1020 Suncast Lane, Suite 106
El Dorado Hills, CA 95762
(916) 235-0116

PROJECT TITLE: West Area Neighborhoods Specific Plan

PROJECT LOCATION: The West Area Neighborhoods Specific Plan (also-known-as “Specific Plan”, “Plan Area”) encompasses approximately 7,077 acres (or a little more than 11 square miles) in the City of Fresno city limits and unincorporated Fresno County. The footprint of the Specific Plan is referred to as the “Plan Area.” The Plan Area is located generally west of Highway 99, north of Clinton Avenue, east of Garfield Avenue, and south of the San Joaquin River. Of the eleven square miles within the Plan Area, 6.9 square miles are in the city limits and 4.1 square miles are in the growth area. The growth area is land outside the city limits but within the City’s Sphere of Influence (SOI) boundary, which is the adopted limit for future growth. The Plan Area is not included on the lists of sites enumerated under Section 65962.5 of the Government Code (Hazardous Waste and Substances Site List maintained by the Department of Toxic Substances Control).

PROJECT DESCRIPTION: The following provides a brief summary and overview of the proposed project. Chapter 2.0 of this EIR includes a detailed description of the proposed project, including maps and graphics. The reader is referred to Chapter 2.0 for a more complete and thorough description of the components of the proposed project.

The proposed Specific Plan 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 Specific Plan will serve as a bridge between the Fresno General Plan and individual development applications in the Plan Area.

The proposed Specific Plan refines the General Plan’s land use vision for the Plan Area. The draft land use map proposes the relocation of higher density land uses away from the most western and southwestern portions of the Plan Area where they are distant from public transit and community amenities and transfers those higher density land use designations to major corridors. The West Area Neighborhoods Specific Plan land use plan utilizes the City’s existing General Plan land use designations to maintain or re-designate some parcels in the Plan Area. See Table 2.0-1 for a summary of the existing and proposed land uses within the city limits, growth area, and Plan Area. See Figure 2.0-6 for the proposed General Plan land use designations.

The parcels that are currently within the County will not be rezoned. Instead, upon a proposal to annex unincorporated land into the city limits, the City of Fresno would pre-zone the land to a zone that is consistent with the General Plan land use. Once annexation occurs, the County zoning would no longer apply to the parcel.

The Specific Plan land use plan would allow for the future development of up to 83,129 dwelling units (DU) (including 339 DU in the commercial category, 49,355 DU in the residential category and 33,436 DU in the mixed use category), and 59,777,271.15 square feet (SF) of non-residential uses. The proposed land use plan also designates public facility uses that are currently existing within the Plan Area, including schools, fire stations, and places of worship. Additionally, the proposed land use plan would allow for approximately 338.95 acres of park, open space, and ponding basin uses.

The Specific Plan also includes circulation and utility improvements, some of which are planned in the City's current program for capital improvements.

For more details regarding the project background, development allowance, land uses, and guiding principles, please see Chapter 2.0, Project Description, of the Draft EIR available at: <https://www.fresno.gov/westareaplan>

SIGNIFICANT ENVIRONMENTAL EFFECTS: The Recirculated Draft EIR identifies significant environmental impacts related to the following environmental topics: Aesthetics; Agricultural Resources; Air Quality; Public Services and Recreation; Transportation and Circulation; Utilities and Service Systems; Cumulative Aesthetics; Cumulative Agricultural Resources; Cumulative Air Quality; Cumulative Public Services and Recreation; and Cumulative Transportation and Circulation. All other environmental issues were determined to have no impact, less than significant impacts, or less than significant impacts with mitigation measures incorporated into the project.

PUBLIC REVIEW PERIOD: The City published a public Notice of Availability (NOA) for the Draft EIR on February 10, 2022 inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH # 2019069117) and the County Clerk, and was published in a local newspaper pursuant to the public noticing requirements of CEQA. The Draft EIR was available for public review and comment from February 10, 2022 through March 28, 2022.

The City received nine written comments on the Draft EIR. Some of the comments included text clarifications and corrections, and requested changes to a mitigation measure proposed to address impacts to Important Farmlands. Additionally, City of Fresno staff initiated several changes to the Project Description and identified clarifications and/or corrections needed to the proposed Land Use Map. The Land Use Map and allowed land use densities were updated to have no net loss of housing capacity compared with the current General Plan housing capacity for the Plan Area. The complete summary of changes to the Project Description is included in Section 1.3 of Chapter 1.0 of the Draft EIR.

In response to the comments, and due to the Project Description changes, City staff determined that the Draft EIR be revised to address the land use modifications and revised environmental analysis associated with the increase in residential development potential.

All sections of the original Draft EIR have been revised and, given the extent of these changes and in accordance with State CEQA Guidelines, Section 15088.5, the City has elected to recirculate the entire revised Draft EIR, with associated appendices, to provide the public and agencies with ample opportunity to review and comment on the updated analysis and new project information, including additional technical data related to circulation and vehicle miles travelled (VMT), air quality modeling, water demand estimations, and traffic noise modeling. Procedures for commenting on this revised analysis are detailed further below.

City of Fresno staff initiated several changes to the Project Description and identified clarifications and/or corrections needed to the proposed Land Use Map. The Land Use Map and allowed land use densities were updated to have no net loss of housing capacity compared with the current General Plan housing capacity for the Plan Area. The Specific Plan analyzed in the original (2022) Draft EIR allowed for the future development of up to 54,953 dwelling units (DU) (including 67 DU in the commercial category, 47,072 DU in the residential category and 7,814 DU in the mixed use category) and 60,621,006 square feet (SF) of non-residential uses. The Specific Plan analyzed in this (2024) Recirculated Draft EIR allows for the future development of up to 83,129 DU (including 339 DU in the commercial category, 49,355 DU in the residential category and 33,436 DU in the mixed use category) and 59,777,271 SF of non-residential uses. This increase accounts for an increase in allowed densities in the mixed use zones, per Council Ordinance 2022-029.

The original (2022) Land Use Map did not have dual designations assigned erroneously; the dual designations have been assigned under the proposed (2024) Land Use Map. Future development would be allowed under the dual designation, and the dual designation would represent the capacity of the property. For instance, if a property has a dual designation of park-allowing uses, and the City cannot purchase it, the land owner is allowed to build under the dual designation instead (i.e., residential, commercial, etc.). The development projections provided assume the more intensive land use would be developed if a parcel has a dual designation.

Additionally, to increase residential capacity in the city, in Fall 2022, City Council approved Ordinance 2022-029, which removed maximum density limits for Neighborhood Mixed Use (NMX), Corridor/Center Mixed Use (CMX), Regional Mixed Use (RMX), and Commercial Regional (CR) land uses. In order to provide a practical maximum density, the development potential calculations use the following densities:

- NMX: 64 DU/AC;
- CMX: 75 DU/AC;
- RMX: 90 DU/AC; and
- CR: 80 DU/AC.

Further, since the original (2022) Draft EIR was published, Fire Station 18 in the Plan Area has opened on Shaw Avenue and is included in the updated Land Use Map.

A 47-day public review period for the Draft EIR will commence on March 12, 2025 and end on April 28, 2025 for interested individuals and public agencies to submit written comments on the document. Written comments concerning the Recirculated Draft EIR are due by 5:00 p.m. on April 28, 2025 and should be submitted to the attention of Casey Lauderdale, Supervising Planner, at the City of Fresno, 2600 Fresno Street, Room 3065, Fresno, CA 93721; or by e-mail to casey.lauderdale@fresno.gov, 559.621.8515. Copies of the Recirculated Draft EIR can be reviewed at the following locations and online at: <https://www.fresno.gov/westareaplan>.

City of Fresno
Planning & Development
2600 Fresno St., Rm. 3043
Fresno, CA 93721
(559) 621-8003

Central Branch Library
2420 Mariposa Street
Fresno, CA 93721
(559) 600-READ (7323)

Teague Branch Library
4718 N Polk Avenue
Fresno, CA 93722
(559) 275-3918



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

CONVEYANCE. COMMITMENT. CUSTOMER SERVICE.

March 28, 2022

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

RE: Notice of Availability West Area Neighborhood Specific Plan – Draft
Environmental Impact Report

Dear Ms. Lauderdale:

The Fresno Irrigation District (FID) has reviewed the Notice of Availability West Area Neighborhood Specific Plan – Draft Environmental Impact Report for the City of Fresno. FID has the following comments:

1. FID previously reviewed and commented on the subject documents on July 26, 2019, as City of Fresno West Area Specific Plan Notice of Preparation. Those comments and conditions still apply and a copy has been attached for your review.

FID has the following additional comments:

1. Canal Access – FID will continue to access its Canal(s) from public roads. In order to access the maintenance bank with our larger equipment, FID requires a drive approach wide enough to accommodate the equipment. FID requires a 50-foot wide drive approach narrowing to a 20 feet wide drive banks. The 50-foot width is defined as starting from the end portion of a bridge/railing outward (away from the bridge). Every road and canal intersection is different and therefore each access will be different. The major factors affecting the proposed width will be the angle of the road intersecting the Canal, grade of canal bank vs. City road, median vs. no median, etc.
 - a. If guard railings extend beyond attachment points at each wing-wall, they

G:\Agencies\FresnoCity\EIR\DEIR West Area Specific Plan\West Area Specific Plan EIR.doc

BOARD OF DIRECTORS

President RYAN JACOBSEN Vice-President JERRY PRIETO, JR. CHRISTOPHER WOOLF
GEORGE PORTER GREGORY BEBERIAN General Manager BILL STRETCH

will obstruct FID's access to the canal and additional right-of-way will need to be acquired. FID will require the developer demonstrate FID's longest vehicle will be able to make the turns onto the drive banks. FID's right-of-way is a minimum 20-feet from the canal hinge on both sides of the canal, and FID will require the developer acquire and dedicate to FID exclusive easements for this purpose.

2. Canal Banks – If there will be any work on canal banks, the following will apply:
 - a. All in-channel disturbed soil shall be concrete lined (both side slopes and bottom). FID will require reinforced concrete to limit the on-going maintenance that typically occurs with gunite or shotcrete slope protection.
 - b. Drive banks must be sloped a minimum of 2% away with a maximum of 4% from the canal with provisions made for rainfall. Drainage will not be accepted into the Canal and must be routed away from FID property/drive banks. Runoff must be conveyed to nearby public streets or drainage system by drainage swales or other FID acceptable alternatives outside FID's easements/property.
 - c. All existing trees, bushes, debris, old canal structures, pumps, canal gates, and other non- or in-active FID and private structures must be removed within FID's property/easement and the City's project limits.
3. Trail - It is FID's understanding that many trails are master-planned within the Southeast Development Area. As with other developments with trails along the canals, FID will not allow the trail to encroach/overlap FID's canal easement unless an agreement is in place for this purpose. The following requirements are intended for trail projects adjacent to FID-owned properties and right-of-ways for open canals:
 - a. FID will not allow the trail easement to be in common use with FID-owned property or easements.
 - b. FID requires all trail improvements be placed outside of FID-owned properties and easements.
 - c. FID will not allow any portion of a tree canopy to encroach within its properties or easements.
 - d. FID's canals will not accept any drainage from the trail or the canal bank.

Casey Lauderdale
Re: West Area Specific Plan EIR
March 28, 2022
Page 3 of 3

- e. FID may require some improvements be made to the canal depending on the existing canal condition, the proposed trail, and the adjacent development.
- f. City parks that are adjacent to open canals are treated the same as trails, therefore the same requirements shall apply.

Thank you for submitting this for our review. We appreciate the opportunity to review and comment on the subject documents for the proposed project. If you have any questions please feel free to contact Jeremy Landrith at (559) 233-7161 extension 7407 or jlandrith@fresnoirrigation.com.

Sincerely,



Laurence Kimura, P.E.
Chief Engineer

Attachments

Due 3/28

NOTICE OF AVAILABILITY
WEST AREA NEIGHBORHOODS SPECIFIC PLAN – DRAFT ENVIRONMENTAL IMPACT REPORT

LEAD AGENCY:
City of Fresno Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
(559) 621-8003

EIR CONSULTANT:
De Novo Planning Group
1020 Suncoast Lane, Suite 106
El Dorado Hills, CA 95762
(916) 580-9818

PROJECT TITLE: West Area Neighborhoods Specific Plan

PROJECT LOCATION: The West Area Neighborhoods Specific Plan (also-known-as “Specific Plan”, “Plan Area”) encompasses approximately 7,077 acres (or a little more than 11 square miles) in the City of Fresno city limits and unincorporated Fresno County. The footprint of the Specific Plan is referred to as the “Plan Area.” The Plan Area is located generally west of Highway 99, north of Clinton Avenue, east of Garfield Avenue, and south of the San Joaquin River. Of the eleven square miles within the Plan Area, 6.9 square miles are in the city limits and 4.1 square miles are in the growth area. The growth area is land outside the city limits but within the City’s Sphere of Influence (SOI) boundary, which is the adopted limit for future growth. The Plan Area is not included on the lists of sites enumerated under Section 65962.5 of the Government Code (Hazardous Waste and Substances Site List maintained by the Department of Toxic Substances Control).

PROJECT DESCRIPTION: The proposed Specific Plan 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 Specific Plan will serve as a bridge between the Fresno General Plan and individual development applications in the Plan Area. The proposed Specific Plan refines the General Plan’s land use vision for the Plan Area. The draft land use map proposes the relocation of higher density land uses away from the most western and southwestern portions of the Plan Area where they are distant from public transit and community amenities and transfers those higher density land use designations to major corridors. The West Area Neighborhoods Specific Plan land use plan utilizes the City’s existing General Plan land use designations to maintain or re-designate some parcels in the Plan Area.

The Specific Plan land use plan that was recommended by the Steering Committee would allow for the future development of up to 54,953 dwelling units (DU) (including 67 DU in the commercial category, 47,072 DU in the residential category and 7,814 DU in the mixed use category), and 60,621,006 square feet (SF) of 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. In the northern portion of the Plan Area, Fire Station No. 18 is temporarily located off of West Bullard Avenue at 5938 North La Ventana Avenue. Fire Station 18 will be relocated to a permanent location on the south side of the 6000 block of West Shaw Avenue to maximize the department’s response time goal. Additionally, the proposed land use plan would allow for approximately 248 acres of park, open space, and ponding basin uses. The Specific Plan also includes circulation and utility improvements, some of which are planned in the City’s current program for capital improvements.

For more details regarding the project background, development allowance, land uses, and guiding principles, please see Chapter 2.0, Project Description, of the Draft EIR available at: <https://www.fresno.gov/westareaplan>

SIGNIFICANT ENVIRONMENTAL EFFECTS: The Draft EIR has identified the following environmental issue areas as having significant and unavoidable environmental impacts from implementation of the project: Aesthetics; Agricultural Resources; Air Quality; Public Services and Recreation; Transportation and Circulation; Utilities; Cumulative Aesthetics; Cumulative Agricultural Resources; Cumulative Air Quality; and Cumulative Public Services and Recreation. All other environmental issues were determined to have no impact, less than significant impacts, or less than significant impacts with mitigation measures incorporated into the project.



YOUR MOST VALUABLE RESOURCE - WATER

OFFICE OF
FRESNO
IRRIGATION DISTRICT

TELEPHONE (559) 233-7161
FAX (559) 233-8227
2907 S. MAPLE AVENUE
FRESNO, CALIFORNIA 93725-2208

July 26, 2019

Rodney L. Horton
Development and Resource Management Department
City of Fresno
2600 Fresno Street, Room 3065
Fresno, CA 93721

RE: City of Fresno West Area Specific Plan Notice of Preparation
FID Facilities: Various

Dear Mr. Horton:

The Fresno Irrigation District (FID) has reviewed the West Area Specific Plan Notice of Preparation for the City of Fresno (Project). The Planning Area is triangular in shape and located west of SR 99. The project area is bounded by West Clinton Avenue, and to the west by Grantland and Garfield avenues. Your proposed project is a significant development and requires thorough and careful consideration of potential impacts. FID has the following comments:

Impacted Facilities

1. FID has many canals within the Project Area as shown on the attached FID exhibit map. The facilities include: Herndon No. 39, Epstein No. 48, Silvia No. 47, Minor-Thornton No. 459, Teague School No. 46, Tracy No.44, and Victoria Colony No. 43. FID's canals range from smaller diameter pipelines to large open canals. In most cases, the existing facilities will need to be upgraded to meet current urban standards or relocated by the developer to accommodate new urban developments and provide for public safety which will require new pipelines and new exclusive easements. FID will impose the same conditions on future projects as it would with any other project located within the common boundary of the City of Fresno and FID including, but not limited to requirements from FID specified exclusive easements, access points, and drive approaches at all road crossings. Additionally, FID will also require all impacted open channel drive banks, to be built out to FID specified widths, heights, and overlaid with all-weather road. FID will require that it review and approve all maps and plans which impact FID canals and easements.

2.
 - a. Small/Medium Canal Crossings – The majority of the proposed Planning Area will impact existing pipelines and small open channel canals. FID will require all open channels and existing pipelines impacted by the project area development be upgraded to meet FID's then current standards for urban, rural, industrial areas. The majority of FID's facilities that lie within the proposed Planning Area do not meet FID's urban specifications, including road or highway crossings. The majority of the existing pipelines are monolithic cast-in-place concrete pipe (CIPCP), low head/thin wall PVC, and non-reinforced mortar jointed concrete pipeline. These pipelines were designed for a rural environment and must be replaced as development occurs.
 - b. Large Canal Crossing – There is a large canal called Herndon Canal No. 39 that will more than likely be too large to be contained within a pipeline. Development impacts to this facility shall require designs that protect the canal's integrity for an urban setting including the need for access and full right-of-way widths for FID's operations and maintenance needs.
3. FID's facilities that are within the Planning Area carry irrigation water for FID users, recharge water for the City of Fresno, and flood waters during the winter months. In addition to FID's facilities, private facilities also traverse the Planned Area.

Water Supply Impact

1. The Planning Area is located within Growth Area 1 of the Cooperative Water Utilization and Conveyance Agreement between the City of Fresno and FID. Should any outside developments receive water through any Extraterritorial Agreements, FID requires it review and approve all Agreements. Areas that are outside of the said Conveyance Agreement or within Growth Area 2 are not entitled to waters from FID.
2. California enacted landmark legislation in 2014 known as the Sustainable Groundwater Management Act (SGMA). The act requires the formation of local groundwater sustainability agencies (GSAs) that must assess conditions in their local water basins and adopt locally-based management plans. FID and the City of Fresno are members of the North Kings Groundwater Sustainability Agency which will manage the groundwater basin within the FID service area. This area is heavily reliant on groundwater pumping and SGMA will impact all users of groundwater and those who rely on it. The City of Fresno should consider the potential impacts of the development on the City's ability to comply with requirements of SGMA.

Mr. Rodney L. Horton
Re: West Area Specific Plan Notice of Preparation
July 26, 2019
Page 3 of 3

3. The proposed developments may negatively impact local groundwater supplies. A large portion of the planned area is currently being used for agricultural purposes. Under current circumstances the project area is experiencing a modest, but continuing groundwater overdraft. Should the proposed developments result in a greater consumption of groundwater, this deficit will increase. FID suggests the City of Fresno require balancing anticipated groundwater use with sufficient recharge of imported surface water to preclude increasing the area's existing groundwater overdraft and require the use of reclaimed water or other conservation methods.

Thank you for providing to us the Notice of Preparation for the City of Fresno's West Area Specific Plan Notice of Preparation for our review and allowing us the opportunity to provide comments. We appreciate the opportunity to review and comment on the subject documents for this project. FID reserves the right to provide additional comments when more detailed information becomes available. If you have any questions please feel free to contact Jeremy Landrith at (559) 233-7161 extension 7407 or JLandrith@fresnoirrigation.com.

Sincerely,



Laurence Kimura, P.E.
Chief Engineer

Attachments



NOTICE OF PREPARATION

FOR THE

SPECIFIC PLAN OF THE WEST AREA

JULY 2019

Prepared for:



Development and Resources Management Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
(559) 621-2485

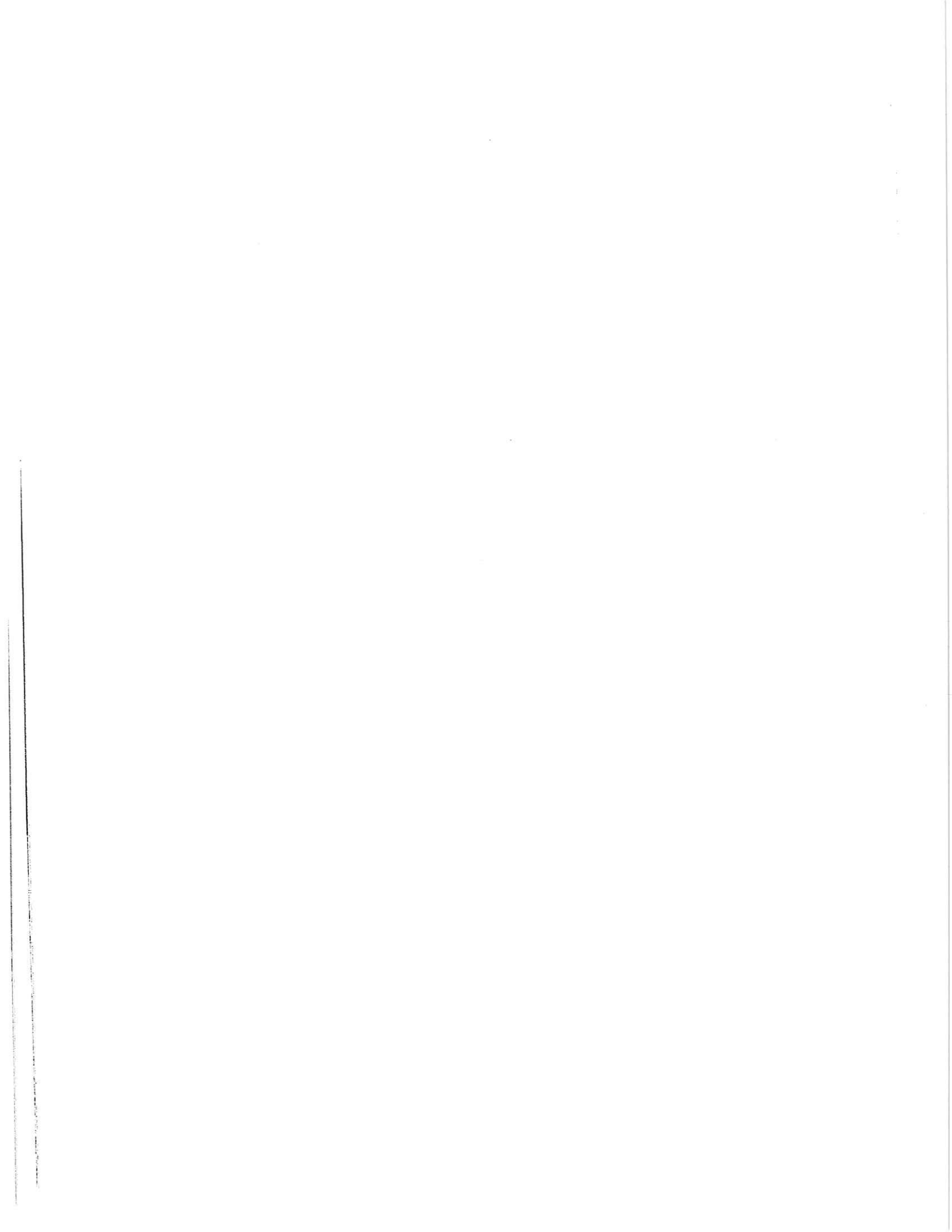
Prepared by:

De Novo Planning Group
1020 Suncoast Lane, Suite 106
El Dorado Hills, CA 95762
(916) 580-9818

D e N o v o P l a n n i n g G r o u p

A Land Use Planning, Design, and Environmental Firm





NOTICE OF PREPARATION

FOR THE

SPECIFIC PLAN OF THE WEST AREA

JULY 2019

Prepared for:



Development and Resources Management Department

2600 Fresno Street, Room 3065

Fresno, CA 93721

(559) 621-8003

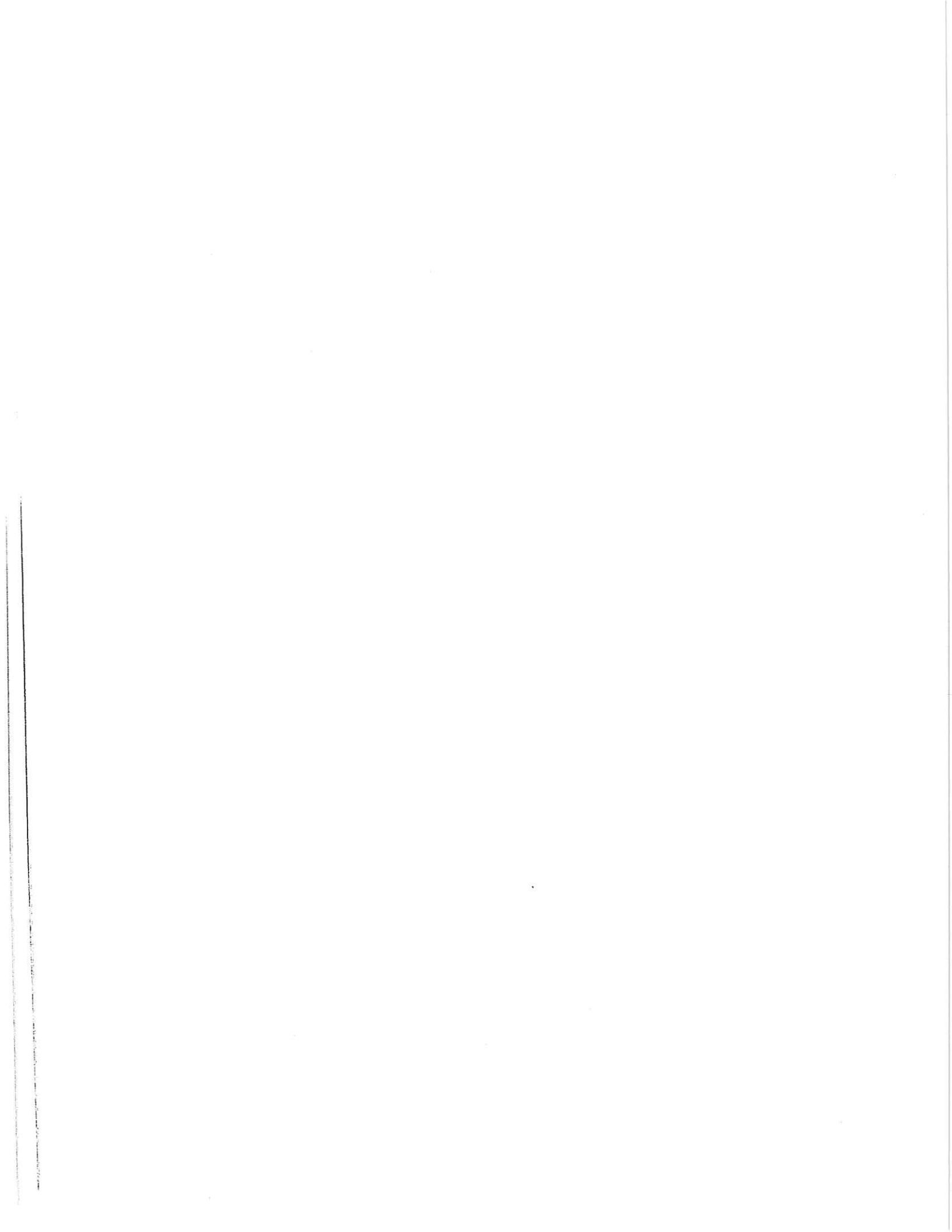
Prepared by:

De Novo Planning Group

1020 Suncast Lane, Suite 106

El Dorado Hills, CA 95762

(916) 580-9818



**NOTICE OF PREPARATION OF AN
ENVIRONMENTAL IMPACT REPORT AND
SCOPING MEETING**

DATE: July 2, 2019

TO: State Clearinghouse
State Responsible Agencies
State Trustee Agencies
Other Public Agencies
Organizations and Interested Persons

SUBJECT: Notice of Preparation of an Environmental Impact Report and Scoping Meeting for the Specific Plan of the West Area

LEAD AGENCY: City of Fresno, Development and Resources Management Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
(559) 621-2485

PROJECT PLANNER: Rodney Horton
rodney.horton@fresno.gov
(559) 621-8181

PURPOSE OF NOTICE

This is to notify public agencies and the general public that the City of Fresno, as the Lead Agency, will prepare an Environmental Impact Report (EIR) for the Specific Plan of the West Area. The City of Fresno is interested in the input and/or comments of public agencies and the public as to the scope and content of the environmental information that is germane to the agencies' statutory responsibilities in connection with the proposed project, and public input. Responsible/trustee agencies will need to use the EIR prepared by the City of Fresno when considering applicable permits, or other approvals for the proposed project.

COMMENT PERIOD

Consistent with the time limits mandated by State law, your input, comments or responses must be received in writing and sent at the earliest possible date, but not later than 5:00 PM, August 2, 2019.

Please send your comments/input (including the name for a contact person in your agency) to: Attn: Rodney Horton at the City of Fresno, 2600 Fresno Street, Room 3065, Fresno, CA 93721; or by e-mail to rodney.horton@fresno.gov.

SCOPING MEETING

On July 24, 2019, the City of Fresno will conduct a public scoping meeting to solicit input and comments from public agencies and the general public on the proposed project and scope of the EIR. This meeting will be held at the Glacier Point Middle School, Cafeteria, located at 4055 N. Bryan Avenue, Fresno, CA 93722, from 6:00 PM to 7:30 PM.

This meeting will be an open house format and interested parties may drop in to review the proposed project exhibits and submit written comments at any time between 6:00 PM and 7:30 PM. Representatives from the City of Fresno and the EIR consultant will be available to address questions regarding the EIR process and scope. Members of the public may provide written comments throughout the meeting.

If you have any questions regarding the scoping meeting, contact Rodney Horton, Project Planner, at (559) 621-8181 or rodney.horton@fresno.gov.

PROJECT LOCATION

The Specific Plan of the West Area (also-known-as "Specific Plan" or "West Area") encompasses approximately 7,077 acres (or a little more than 11 square miles) in the City of Fresno city limits and unincorporated Fresno County. The footprint of the Specific Plan is referred to as the "Plan Area." Of the eleven square miles within the Plan Area, 6.9 square miles are in the city limits and 4.1 square miles are in the growth area. The growth area is land outside the city limits but within the City's Sphere of Influence (SOI) boundary, which is the adopted limit for future growth.

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 99. See Figure 1 for the regional location map and Figure 2 for the Plan Area vicinity map.

PROJECT SETTING

EXISTING SITE CONDITIONS

The Plan Area is relatively flat with natural gentle slope near State Route 99. The Plan Area topography ranges in elevation from approximately 283 to 315 feet above mean sea level. A significant amount of land in the Plan Area is farmland or rural residential lots with large, uneven, and underutilized parcels. The West Area has approximately 3,070.95 acres of land that is classified as Urban and Built-Up, according to the State Department of Conservation. Prime farmland is principally located outside of the Plan Area. The West Area has 285.65 acres of Farmland of Statewide Importance which is located primarily in the western edge of the Plan Area. Approximately 509.39 acres of Unique Farmland is located within the Plan Area, most of which is within the southwest portion of the Plan Area. Farmland of Local Importance is located throughout the entire Plan Area, and totals approximately 1,562.82 acres. Vacant or Disturbed Land and Rural Residential Land account for approximately 1,650.17 acres within the growth area. See Figure 3 for an aerial view of the Plan Area.

SURROUNDING LAND USES

Surrounding land uses include State Route 99, the unincorporated communities of Herndon, Highway City, and Muscatel, and incorporated areas of the City of Fresno to the north (including mostly industrial uses), incorporated areas of the City of Fresno to the east (also including mostly industrial uses), unincorporated Fresno County and incorporated areas of the City of Fresno to the south (including farmland uses, rural residential uses, low density residential uses, and underutilized parcels) and unincorporated Fresno County to the west (including farmland and rural residential uses).

EXISTING LAND USES AND ZONING

A portion of the Plan Area is located within the City of Fresno city limits, and a portion is within unincorporated Fresno County (but within the City's SOI). The City of Fresno General Plan designates the Plan Area as: Low Density Residential, Medium Low Density Residential, Medium Density Residential, Urban Neighborhood Residential, High Density Residential, Community Commercial, General Commercial, Recreation Commercial, Office, Business Park, Light Industrial, Corridor/Center Mixed Use, Regional Mixed Use, Community Park, Open Space – Ponding Basin, Neighborhood Park, Open Space, Public/Quasi-Public Facility, Special School, Elementary School, Elementary, Middle & High School, and High School. See Figure 4 for the existing City General Plan land use designations.

The City of Fresno Zoning Map provides zoning for those portions of the Plan Area located within the city limits, but not for areas within the unincorporated County. Zoning designations are generally consistent with the existing General Plan land uses. The City zoning designations for the Plan Area include: Residential Estate (RE), Residential Single-Family, Extremely Low Density (RS-1), Residential Single-Family, Very Low Density (RS-2), Residential Single-Family, Low Density (RS-3), Residential Single-Family, Medium Low Density (RS-4), Residential Single-Family, Medium Density (RS-5), Residential Multi-Family, Medium High Density (RM-1), Residential Multi-Family, Urban Neighborhood (RM-2), Residential Multi-Family, High Density (RM-3), Mobile Home Park (RM-MH), Commercial Community (CC), Commercial General (CG), Commercial Regional (CR), Commercial Recreation (CRC), Light Industrial (IL), Corridor/Center Mixed Use (CMX), Neighborhood Mixed Use (NMX), Regional Mixed Use (RMX), Business Park (BP), Office (O), Open Space (OS), and Park and Recreation (PR). See Figure 5 for the existing zoning designations.

The Fresno County Zoning Map designates the portions of the Plan Area outside the city limits as: Rural Commercial Center (RCC), Central Trading (C4), General Commercial (C6), Light Industrial (M1), Exclusive Agricultural (AE20), Limited Agricultural (AL20), Rural Residential (RR), Single Family Residential Agricultural (RA), Single Family Residential (12,500) (R1B), and Trailer Park Residential (TP). Upon a proposal to annex unincorporated land into the city limits, the City of Fresno would prezone the land to a zone that is consistent with the General Plan land use. Once annexation occurs, the County zoning would not apply to the parcel.

PROJECT GOALS AND OBJECTIVES

Consistent with the California Environmental Quality Act (CEQA), Guidelines Section 15124(b), a clear statement of objectives and the underlying purpose of the proposed project shall be discussed. The objectives of the proposed project include future development of land for a wide variety of land uses including: Low Density Residential, Medium Low Density Residential, Medium Density Residential, Medium High Density Residential, Urban Neighborhood Residential, High Density Residential, Community Commercial, Recreation Commercial, General Commercial, Regional Commercial, Office, Business Park, Light Industrial, Corridor/Center Mixed Use, Regional Mixed Use, Pocket Park, Neighborhood Park, Community Park, Open Space, Ponding Basin, Public Facility, Church, Special School, Elementary School, Elementary, Middle & High School, High School, and Fire Station uses, as well as the required transportation and utility improvements.

Other objectives and purposes of the Specific Plan are summarized as follows:

- Accommodate and improve roadway access, connectivity and mobility among all modes of transportation, and prioritize roadway widening where bottlenecking exists.
- Accommodate planned transit services in the West Area by locating routes near or adjacent to the community centers, schools, parks, and retail centers.
- Provide a complete, safe, and well-maintained sidewalk network from residential neighborhoods to commercial centers, schools, parks, and community centers.
- Provide a complete, safe, and well-maintained roadway network that allows for efficient and smooth access from the West Area to other sections of the City and region.
- Create parks that are within existing and planned neighborhoods that are easily accessed by community members using pedestrian and bicycle pathways, transit services, or motor vehicles, consistent with the City of Fresno's Parks Master Plan.
- Provide for the location of a flagship Regional Park in the Plan Area that has components of the Plan Area's agricultural history through the planting of drought-resistant vegetation or trees, and the creation of public art that exhibits the Plan Area's contribution to the agricultural industry.
- Incorporate elements of agriculture in future parks by planting a mixture of native drought tolerant vegetation, shrubs, and trees that can serve to provide shade and enhance the streetscape.
- Encourage and provide land use opportunities for agri-tourism ventures to occur in the West Area.
- Encourage the development of harvest – producing community gardens.
- Attract desired and needed local retail establishments to serve the needs of the West Area community. Such establishments include grocery stores, bakeries, restaurants other than fast food places, and boutiques.
- Discourage the expansion of undesirable retail establishments such as liquor stores, tobacco and vapor stores, short-term loan and pawn shops, and adult stores.
- Encourage the development of retail establishments along commercial corridors.

- Encourage the orderly and consistent development of civic, parkland, retail and commercial, mixed-use, and multi-family uses along West Shaw Avenue, West Ashlan Avenue, Veterans Boulevard, West Shields Avenue, West Clinton Avenue, and Blythe Avenue.
- Encourage a variety of housing types and styles.
- Encourage the development of housing to accommodate an aging population including, multi-generational houses and other elder housing options.
- Reaffirm the City's commitment and obligation to affirmatively furthering access to fair and affordable housing opportunities by strongly encouraging equitable and fair housing opportunities to be located in strategic proximity to employment, recreational facilities, schools, neighborhood commercial areas, and transportation routes.
- Attract much needed educational opportunities for the residents of the West Area, especially for post-secondary education, and access to programs for life-long learners.
- Provide for safe routes to schools for children, with the City and County working together with residents, to provide sidewalks in neighborhood that have sporadic access.
- Work to promote Neighborhood Watch in all neighborhoods, and further assess the need for the location of emergency response facilities west of State Route 99.

PROJECT CHARACTERISTICS AND DESCRIPTION

BACKGROUND

The proposed Specific Plan process officially started in September 2017 with the drafting of the existing conditions report. That document provides a detailed overview of the existing land uses within the Plan Area. Outreach to the West Area community started in early 2018 with individual meetings between City staff and community stakeholders, including residents, local agencies, institutional partners, elected officials, land owners, and developers. Public outreach included community stakeholder interviews, Steering Committee orientation sessions and meetings, community meetings and workshops, and an on-line survey.

The 11-member Steering Committee, established in March 2018 by the Fresno City Council, held regular public meetings to provide recommendations to the draft land use map and guiding principles based on input received from community members. Additionally, approximately 25 community stakeholders were interviewed from January 2018 to April 2018. Next, a kick-off survey regarding the Plan Area was released in April 2018. The survey covered topics such as quality of life, needed improvements, needed housing and commercial development, agri-tourism, and the overall future vision for the Plan Area. Two community conversations (i.e., workshops) were also held in order to receive feedback: Community Conversation No. 1 was held in May 2018, and Community Conversation No. 2 was held in June 2018. The Steering Committee then held meetings in June, July, August, November, and January 2018 in order to review and select the conceptual land use options. The draft land use map and guiding principles were released to the public on November 28, 2018. The draft land use map was then amended by the Steering Committee in January 2019. Lastly, an agri-tourism workshop was held in the spring of 2019.

INTRODUCTION

The proposed Specific Plan 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 Specific Plan will serve as a bridge between the Fresno General Plan and individual development applications in the Plan Area.

The Specific Plan of the West Area seeks to provide for the orderly and consistent development that promotes and establishes the West Area as a complete neighborhood with enhanced transportation infrastructure, development of core commercial centers, creation of additional parkland, and encouraging the development of a diverse housing stock. The Plan Area does not currently have needed commercial amenities, forcing residents to travel east of State Route 99 for retail services. The Plan Area also lacks a complete roadway network and parkland.

LAND USE MAP AND MAXIMUM BUILDOUT POTENTIAL

The proposed Specific Plan refines the General Plan's land use vision for the West Area. The draft land use map proposes the relocation of higher density land uses away from the most western and southwestern portions of the Plan Area where they are distant from public transit and community amenities and transfers those higher density land use designations to major corridors. The Specific Plan of the West Area land use plan utilizes the City's existing General Plan land use designations to maintain or re-designate some parcels in the West Area. Some of the designation changes include: Low Density Residential (1 to 3.5 dwelling units per acre [DU/AC]), Medium Low Density Residential (3.5 to 6 DU/AC), Medium Density Residential (5 to 12 DU/AC), Medium High Density Residential (12 to 16 DU/AC), Urban Neighborhood Residential (16 to 30 DU/AC), High Density Residential (30 to 45 DU/AC), Community Commercial (1.0 maximum floor-area-ratio [FAR]), Recreation Commercial (0.5 maximum FAR), General Commercial (2.0 maximum FAR), Regional Commercial (1.0 maximum FAR), Office (2.0 maximum FAR), Business Park (1.0 maximum FAR), Light Industrial (1.0 maximum FAR), Corridor/Center Mixed Use (16 to 30 UD/AC and 1.5 maximum FAR), Regional Mixed Use (30 to 45 UD/AC and 2.0 maximum FAR), Pocket Park, Neighborhood Park, Community Park, Open Space, Ponding Basin, Public Facility, Church, Special School, Elementary School, Elementary, Middle & High School, High School, and Fire Station. See Table 1 for a summary of the existing and proposed land uses within the city limits, growth area, and Plan Area. See Figure 6 for the proposed General Plan land use designations.

As previously indicated, the City of Fresno Zoning Map designates the Plan Area as: RE, RS-1, RS-2, RS-3, RS-4, RS-5, RM-1, RM-2, RM-3, RM-MH, CC, CG, CR, CRC, IL, CMX, NMX, RMX, BP, O, OS, and PR. The Fresno County Zoning Map designates the portions of the Plan Area outside the city limits as: RCC, C4, C6, M1, AE20, AL20, RR, RA, R1B, and TP. In conjunction with the approval of the Specific Plan, the parcels in the City which would have a changed land use designation as a result of the Specific Plan would be rezoned to the corresponding City zoning designation.

TABLE 1: PARCEL ACREAGES BY LAND USE CLASSIFICATION FOR GENERAL PLAN AND PROPOSED SPECIFIC PLAN

GENERAL PLAN LAND USE DESIGNATIONS	CITY LIMITS		GROWTH-AREA		DIFFERENCE IN GROWTH-AREA		PLAN AREA TOTAL		OVERALL CHANGE
	GENERAL PLAN ACRES	SPECIFIC PLAN ACRES	GENERAL PLAN ACRES	SPECIFIC PLAN ACRES	DIFFERENCE IN CITY	GENERAL PLAN ACRES	SPECIFIC PLAN ACRES	GENERAL PLAN ACRES	
Low	146.20	95.82	671.59	420.76		817.79	516.57		
Medium Low	582.37	821.03	243.59	635.94		825.97	1,456.98		
Medium	1,460.88	1,240.70	896.13	824.67		2,357.00	2,065.37		
Medium High	261.09	224.31	88.33	51.24	- 163.47	349.42	275.55	- 143.64	- 307.11
Urban Neighborhood	214.65	96.53	213.96	75.11		428.61	171.64		
High	28.00	51.33	37.76	0.00		65.76	51.33		
<i>Subtotal - Residential</i>	<i>2,693.19</i>	<i>2,529.72</i>	<i>2,151.36</i>	<i>2,007.72</i>		<i>4,844.55</i>	<i>4,537.44</i>		
Community	81.87	27.40	56.79	25.34		138.66	52.74		
Recreation	41.34	41.34	0.00	0.00		41.34	41.34		
General	141.59	155.38	1.63	65.40	- 40.68	143.21	220.78	+ 36.56	- 4.11
Regional	0.00	0.00	0.00	4.24		0.00	4.24		
<i>Subtotal - Commercial</i>	<i>264.80</i>	<i>224.12</i>	<i>58.42</i>	<i>94.98</i>		<i>323.21</i>	<i>319.10</i>		
Office	7.51	42.94	0.00	45.87		7.51	88.81		
Business Park	22.71	20.57	54.40	35.45		77.11	56.02		
Light Industrial	33.13	32.75	0.00	0.00	+ 32.91	33.13	32.75	+ 26.92	+ 59.84
<i>Subtotal - Employment</i>	<i>63.35</i>	<i>96.26</i>	<i>54.40</i>	<i>81.32</i>		<i>117.75</i>	<i>177.59</i>		
Neighborhood	0.00	211.12	0.00	44.83		0.00	255.95		
Corridor/Center	106.19	71.78	0.00	24.23		106.19	96.00		
Regional	144.72	82.61	0.00	0.00	+ 114.60	144.72	82.61	+ 69.06	+ 183.66
<i>Subtotal - Mixed Use</i>	<i>250.90</i>	<i>365.50</i>	<i>0.00</i>	<i>69.06</i>		<i>250.90</i>	<i>434.56</i>		
Pocket Park	2.45	1.55	0.00	0.00		2.45	1.55		
Neighborhood Park	36.67	39.22	47.04	47.04		83.71	86.26		
Community Park	24.20	24.20	13.98	0.00		38.18	24.20		
Regional Park	0.00	0.00	0.00	0.00		0.00	0.00		
Open Space	5.03	5.03	1.76	1.76	+ 24.58	6.79	6.79	+ 14.49	+ 10.09
Ponding Basin	67.06	89.99	40.12	39.60		107.18	129.59		
<i>Subtotal - Open Space</i>	<i>135.41</i>	<i>159.99</i>	<i>102.90</i>	<i>88.41</i>		<i>238.31</i>	<i>248.40</i>		
Public Facility	4.98	12.64	16.81	14.78		21.78	27.42		
Church	9.98	21.20	1.66	34.60		11.59	55.80		
Special School	4.50	4.50	13.88	13.88		18.38	18.38		
Elem. School	56.18	66.17	25.65	25.65		81.82	91.82		
Elem./Middle/High School	145.37	145.37	0.00	0.00	+ 32.05	145.37	145.37	+ 25.59	+ 57.65
High School	46.95	46.95	0.00	0.00		46.95	46.95		
Fire Station	0.20	3.32	5.32	0.00		5.52	3.32		
<i>Subtotal - Public Facilities</i>	<i>268.10</i>	<i>300.15</i>	<i>63.32</i>	<i>88.91</i>		<i>331.41</i>	<i>389.06</i>		
Grand Total	3,675.75	3,675.75	2,430.39	2,430.39		6,106.14	6,106.14		

The parcels that are currently within the County will not be rezoned. Instead, upon a proposal to annex unincorporated land into the city limits, the City of Fresno would prezone the land to a zone that is consistent with the General Plan land use. Once annexation occurs, the County zoning would not apply to the parcel.

Table 2 summarizes the acreages of each land use, the maximum number of units, and the maximum non-residential square footage that would be allowed under the proposed Specific Plan.

TABLE 2: MAXIMUM DEVELOPMENT POTENTIAL WITHIN SPECIFIC PLAN OF THE WEST AREA

GENERAL PLAN LAND USE DESIGNATIONS (AND DENSITY/INTENSITY)	SPECIFIC PLAN ACRES	MAXIMUM DEVELOPMENT POTENTIAL	
		DWELLING UNITS	NON-RESIDENTIAL SF
Low (1-3.5 DU/AC)	516.57	1,807	--
Medium Low (3.5-6 DU/AC)	1,456.98	8,741	--
Medium (5-12 DU/AC)	2,065.37	24,784	--
Medium High (12-16 DU/AC)	275.55	4,408	--
Urban Neighborhood (16-30 DU/AC)	171.64	5,149	--
High (30-45 DU/AC)	51.33	2,309	--
<i>Subtotal - Residential</i>	<i>4,537.44</i>	<i>47,199</i>	<i>--</i>
Community (1.0 Max. FAR)	52.74	--	2,297,354.40
Recreation (0.5 Max. FAR)	41.34	--	900,385.20
General (2.0 Max. FAR)	220.78	--	19,234,353.60
Regional (1.0 Max. FAR)	4.24	--	184,694.40
<i>Subtotal - Commercial</i>	<i>319.10</i>	<i>--</i>	<i>22,616,787.60</i>
Office (2.0 Max. FAR)	88.81	--	--
Business Park (1.0 Max. FAR)	56.02	--	--
Light Industrial (1.0 Max. FAR)	32.75	--	--
<i>Subtotal - Employment</i>	<i>177.59</i>	<i>--</i>	<i>--</i>
Neighborhood (12-16 DU/AC; 1.5 Max. FAR)	255.95	4,095	16,723,773.00
Corridor/Center (16-30 UD/AC; 1.5 Max. FAR)	96.00	2,880	6,272,640.00
Regional (30-45 UD/AC; 2.0 Max. FAR)	82.61	3,717	7,196,983.20
<i>Subtotal - Mixed Use</i>	<i>434.56</i>	<i>10,692</i>	<i>30,193,396.20</i>
Pocket Park	1.55	--	--
Neighborhood Park	86.26	--	--
Community Park	24.20	--	--
Regional Park	0.00	--	--
Open Space	6.79	--	--
Ponding Basin	129.59	--	--
<i>Subtotal - Open Space</i>	<i>248.40</i>	<i>--</i>	<i>--</i>
Public Facility	27.42	--	--
Church	55.80	--	--
Special School	18.38	--	--
Elem. School	91.82	--	--
Elem./Middle/High School	145.37	--	--
High School	46.95	--	--
Fire Station	3.32	--	--
<i>Subtotal - Public Facilities</i>	<i>389.06</i>	<i>--</i>	<i>--</i>
Grand Total	6,106.14	57,891 DU	52,810,183.80 SF

As shown in the table, the Specific Plan would allow for the future development of up to 57,891 DU (including 47,199 DU in the residential category and 10,692 DU in the mixed use category) and 52,810,183.80 SF of 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. In the northern portion of the Plan Area, Fire Station No. 18 is located off of West Bullard Avenue at 5938 North La Ventana Avenue. Fire Station 18 will be relocated to a permanent location on

the south side of the 6000 block of West Shaw Avenue to maximize the department's "4 Minutes to Excellence" response time goal. Additionally, the proposed land use plan would allow for approximately 248 acres of park, open space, and ponding basin uses. The Specific Plan also includes circulation and utility improvements, some of which are planned in the City's current program for capital improvements.

The Specific Plan is designed to provide flexibility, so there is an extensive number of hypothetical variations/combinations for residential and non-residential development. However, the data within the above table represents the maximum density allowed without an amendment approved by the City. In effect, this is very likely an overestimate of what will actually be developed, but for purposes of environmental analysis in the EIR it represents the worst-case scenario.

It is noted that the proposed Specific Plan would amend the land uses for approximately half of the land within the Plan Area. The remaining parcels would maintain their existing land use and zoning designations. The parcels that are proposed for change by the proposed land use map are shown in Figure 7.

REVISIONS TO CORE GOALS

In addition to the proposed land use plan, the following are revisions to the core goals provided in the General Plan for the West Area:

1. West Shaw Avenue Town Center: The West Shaw Avenue Town Center (the Town Center) will extend from State Route 99 to the east side of Grantland Avenue and is envisioned to be comprised of mixed-use development supported by enhanced transit service. Land on the south side of West Shaw Avenue will provide additional neighborhood and commercial mixed-use opportunities.
2. Catalytic Corridors: The proposed Specific Plan designates higher density land uses along corridors for the purpose of providing easy access to major arterials and streets, retail centers, and community amenities. Catalytic corridors will include transit services. The corridors are designed to include neighborhood and pocket parks, commercial and retail uses, educational facilities, multi-family dwelling units, and professional offices. The corridors are located on the following streets:
 - a) West Shaw Avenue, from State Route 99 to the east side of Grantland Avenue;
 - b) West Ashlan Avenue, from State Route 99 to the commercial nodes located on the west side of Grantland Avenue;
 - c) North Blythe Avenue, from West Shields to West Ashlan Avenue;
 - d) West Clinton Avenue from State Route 99 to North Brawley Avenue; and
 - e) Veterans Boulevard, from West Gettysburg Avenue to West Barstow Avenue.

PROJECT ALTERNATIVES

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that meet most or all project objectives while reducing or avoiding one or more significant environmental effects of the project. The range of alternatives required in an EIR is governed by a "rule of reason" that

requires an EIR to set forth only those alternatives necessary to permit a reasoned choice (CEQA Guidelines Section 15126.6(f)). Where a potential alternative was examined but not chosen as one of the range of alternatives, the CEQA Guidelines require that the EIR briefly discuss the reasons the alternative was dismissed.

Alternatives that are evaluated in the EIR must be potentially feasible alternatives. However, not all possible alternatives need to be analyzed. An EIR must "set forth only those alternatives necessary to permit a reasoned choice." (CEQA Guidelines, Section 15126.6(f).) The CEQA Guidelines provide a definition for a "range of reasonable alternatives" and, thus limit the number and type of alternatives that need to be evaluated in an EIR. An EIR need not include any action alternatives inconsistent with the lead agency's fundamental underlying purpose in proposing a project. (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1166.)

First and foremost, alternatives in an EIR must be potentially feasible. In the context of CEQA, "feasible" is defined as:

... capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. (CEQA Guidelines 15364)

The inclusion of an alternative in an EIR is not evidence that it is feasible as a matter of law, but rather reflects the judgment of lead agency staff that the alternative is potentially feasible. The final determination of feasibility will be made by the lead agency decision-making body through the adoption of CEQA Findings at the time of action on the Project. (Mira Mar Mobile Community v. City of Oceanside (2004) 119 Cal.App.4th 477, 489 see also CEQA Guidelines, § 15091(a) (3) (findings requirement, where alternatives can be rejected as infeasible); 15126.6 ([an EIR] must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation".) The following factors may be taken into consideration in the assessment of the feasibility of alternatives: site suitability, economic viability, availability of infrastructure, general plan consistency, other plan or regulatory limitations, jurisdictional boundaries, and the ability of the proponent to attain site control (Section 15126.6 (f) (1)).

ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Equally important to attaining the project objectives is the reduction of some or all significant impacts, particularly those that could not be mitigated to a less-than-significant level. The exact alternatives that will be evaluated in the Draft EIR will be determined through the Notice of Preparation (NOP) and Scoping Process. Through preliminary discussions, there are three alternatives to the proposed Specific Plan that are being contemplated for evaluation in the Draft EIR. The alternatives being considered include the following:

- **No Project (Existing General Plan) Alternative:** Under this alternative, the Plan Area would remain in its current General Plan land use and zoning designations. Future development allowed under the existing General Plan land use map would be permitted in the Plan Area.
- **Regional Park Alternative:** Under this alternative, future development in the Plan Area would occur similar to what would be allowed under the proposed land use map. However, this alternative would provide a Regional Park within the Plan Area, which would be a minimum of 40 acres in size.
- **Lower Density Alternative:** Under this alternative, future development in the Plan Area would occur similar to what would be allowed under the proposed land use map, but at lower densities.

It is noted that the final alternatives selected for analysis in the Draft EIR will be based on the public scoping process, including input received through public comment.

PLAN ADOPTION AND REGULATION

The Specific Plan may include certain development regulations and standards that are intended to be specific to the Specific Plan Area. Where there is a matter or issue not specifically covered by the Specific Plan development regulations and design standards, the Fresno Zoning Code would apply. Where there is a conflict between the Specific Plan and the Zoning Code, the Specific Plan would prevail.

The Specific Plan is intended to be adopted by the City Council and to serve as a tool for the City of Fresno to implement. The Specific Plan is to be used by designers, developers, builders, and planners, to guide development of the Plan Area. The land use, development standards, and design guidelines are provided to ensure that all proposed developments remain consistent with the vision established by the Specific Plan as the Project is built over time. The Specific Plan development concepts, design guidelines, and standards are in accordance with the City's General Plan, Municipal Ordinances, and City Specifications. The Specific Plan shall be used to review, process, and approve development proposals for the Project site including but not limited to site specific development applications and site improvement plans.

TYPE OF EIR

The CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. This EIR has been prepared as a Program EIR pursuant to CEQA Guidelines Section 15168. The program-level analysis considers the broad environmental effects of the proposed project as a whole.

It is noted that the Specific Plan provides a very broad level of planning detail. To the extent that sufficient detail is available in the Specific Plan, a more detailed level of analysis is provided in this EIR. Examples of a more detailed level of analysis would include topics that are related to the physical acreage affected (i.e. the project footprint), maximum number of units (or FAR), land uses/zoning, or other design parameters. In many cases, there will be site specific uses that

will have design details developed at a later date. These details are unknown at this time and cannot reasonably be analyzed at a project-level at this time.

This EIR examines the planning, construction and operation of the project. The program-level approach, with limited project-level analysis, is appropriate for the proposed project because it allows comprehensive consideration of the reasonably anticipated scope of the development plan; however, as discussed above, not all design aspects of the future development phases are known at this stage in the planning process. Subsequent individual development that requires further discretionary approvals will be examined in light of this EIR to determine whether additional environmental documentation must be prepared.

CEQA Guidelines Section 15168 states that a program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:

1. Geographically,
2. As logical parts in the chain of contemplated actions,
3. In connection with issuance of rules, regulations, plans or other general criteria to govern the conduct of a continuing program, or
4. As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

According to CEQA Guidelines section 15168, subdivision (c)(5), "[a] program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible." Later environmental documents (EIRs, mitigated negative declarations, or negative declarations) can incorporate by reference materials from the program EIR regarding regional influences, secondary impacts, cumulative impacts, broad alternatives, and other factors (CEQA Guidelines Section 15168[d][2]). These later documents need only focus on new impacts that have not been considered before (CEQA Guidelines Section 15168[d][3]).

Section 15168(c), entitled "Use with Later Activities," provides, in pertinent part, as follows:

Subsequent activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared:

1. If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.
2. If the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activities as being within the scope of the project covered by the program EIR, and no new environmental document would be required.
3. An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into subsequent actions in the program.

4. Where the subsequent activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the program EIR.

Here, the City anticipates preparing an initial study whenever landowners within the Plan Area submit applications for site-specific approvals (i.e. tentative maps, conditional use permits, or other discretionary entitlements). The initial study would serve in part as a consistency checklist to determine if the application for site specific approval is consistent with the General Plan, Specific Plan, Conditions of Approval, and Mitigation Measures, and it would also include a review of the project details relative to what was anticipated and analyzed in the program EIR (i.e. are there new environmental effects that were not covered by the program EIR). The City's expectation, at least at present, is that the initial study will conclude that most components of the Specific Plan can be developed with no new analysis of environmental effects given that there has been analysis in this program EIR. In some cases, however, a site-specific application (i.e. commercial use) may have specific issues associated with the project, or business, that this program EIR could not anticipate given the information that was available at this time. In those situations, the detailed site-specific information from that application could have site-specific effects not wholly anticipated in this EIR and would require some additional environmental review. (See also CEQA Guidelines section 15063, subd. (b)(1)(C).)

Future site-specific approvals may also be narrowed pursuant to the rules for tiering set forth in CEQA Guidelines Section 15152. "[T]iering is a process by which agencies can adopt programs, plans, policies, or ordinances with EIRs focusing on 'the big picture,' and can then use streamlined CEQA review for individual projects that are consistent with such...[first tier decisions] and are...consistent with local agencies' governing general plans and zoning." (*Koster v. County of San Joaquin* (1996) 47 Cal.App.4th 29, 36.) Section 15152 provides that, where a first-tier EIR has "adequately addressed" the subject of cumulative impacts, such impacts need not be revisited in second- and third-tier documents. Furthermore, second- and third-tier documents may limit the examination of impacts to those that "were not examined as significant effects" in the prior EIR or "[a]re susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means." In general, significant environmental effects have been "adequately addressed" if the lead agency determines that:

1. they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental impact report; or
2. they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

Here, as noted above, the City anticipates preparing Initial Study whenever landowners within the Plan Area submit applications for site-specific approvals (i.e. tentative maps, conditional use

permits, or other discretionary entitlements). The checklist would serve in part as a consistency checklist to determine if the application for site specific approval is consistent with the General Plan, Specific Plan, Conditions of Approval, and Mitigation Measures, and it would also include a review of the project details relative to what was anticipated and analyzed in the program EIR (i.e. have all significant environmental impacts identified been "adequately addressed" in the program EIR). Thus, if a new analysis is required for these site-specific actions, it would focus on impacts that cannot be "avoided or mitigated" by mitigation measures that either (i) were adopted in connection with the Specific Plan or (ii) were formulated based on information in this EIR.

In addition, because the EIR addresses the effects of rezoning the land within the proposed Plan Area, future environmental review can also be streamlined pursuant to Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183. These provisions, which are similar but not identical to the tiering provisions, generally limit the scope of necessary environmental review for site-specific approvals following the preparation of an EIR for a "zoning action." For such site-specific approvals, CEQA generally applies only to impacts that are "peculiar to the parcel or to the project" and have not been previously disclosed, except where "substantial new information" shows that previously identified impacts would be more significant than previously assumed. Notably, impacts are considered not to be "peculiar to the parcel or to the project" if they can be substantially mitigated pursuant to previously adopted, uniformly applied development policies or standards. As noted above, the City anticipates that, in assessing the extent to which the Specific Plan EIR has previously addressed significant impacts that might occur with individual projects, the City may conclude that in some instances (e.g., with respect to agricultural resources, cultural resources, geology, soils, and paleontological resources), no further analysis beyond that found in the program EIR will be necessary.

Finally, for purely residential projects consistent with the Specific Plan, the City intends to preserve its ability to treat such projects as exempt from CEQA pursuant to Government Code section 65457. Subdivision (a) of that statute provides that "[a]ny residential development project, including any subdivision, or any zoning change that is undertaken to implement and is consistent with a specific plan for which an [EIR] has been certified after January 1, 1980, is exempt from the requirements of [CEQA]." The statutes go on to say, moreover, that "if after adoption of the specific plan, an event as specified in Section 21166 of the Public Resources Code occurs, the exemption provided by this subdivision does not apply unless and until a supplemental [EIR] for the specific plan is prepared and certified in accordance with the provisions of [CEQA]. After a supplemental [EIR] is certified, the exemption ... applies to projects undertaken pursuant to the specific plan." (See also CEQA Guidelines section 15182.)

When purely residential projects are proposed, the City will consider whether they qualify for this exemption or whether the Specific Plan EIR must be updated through a supplement to this EIR or a subsequent EIR as required by Public Resources Code section 21166 and CEQA Guidelines sections 15162 and 15163.

PROJECT ENTITLEMENTS

The City of Fresno will be the Lead Agency for the proposed project, pursuant to the State Guidelines for Implementation of CEQA, Section 15050. Actions that would be required from the City include, but are not limited to the following:

- Certification of the EIR and adoption of the Mitigation Monitoring and Reporting Program (MMRP);
- Approval of the Specific Plan of the West Area;
- Approval of the General Plan amendment modifying land uses.
- Approval of the Zoning Ordinance amendment modifying zoning.

The EIR analyzes the impacts of the Specific Plan and the anticipated subsequent filing of maps and other development applications in the future. Therefore, the EIR analyzes the maximum impacts of the Specific Plan, including these applications yet unfiled, so that future filings will not require separate environmental analysis, as long as development proposed does not substantially deviate from the approved Specific Plan.

ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR will involve the following general procedural steps:

NOTICE OF PREPARATION

The City must circulate a NOP of an EIR for the proposed project to responsible and trustee agencies, the State Clearinghouse, and the public. A public scoping meeting must be held during the public review period to present the project description to the public and interested agencies, and to receive comments from the public and interested agencies regarding the scope of the environmental analysis to be included in the Draft EIR. Concerns raised in response to the NOP will be considered during preparation of the Draft EIR. The NOP and responses to the NOP by interested parties will be presented in an appendix to the EIR.

DRAFT EIR

The Draft EIR will contain a description of the project, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The Draft EIR will identify issues determined to have no impact or a less than significant impact, and provides detailed analysis of potentially significant and significant impacts. Comments received in response to the NOP will be considered in preparing the analysis in the EIR. Upon completion of the Draft EIR, the City will file the Notice of Completion (NOC) with the State Clearinghouse of the Governor's Office of Planning and Research to begin the 45-day public review period.

RESPONSE TO COMMENTS/FINAL EIR

Following the public review period, a Final EIR will be prepared. The Final EIR will respond to significant environmental issues raised either in written comments received during the public review period or in oral comments received at a public hearing during such review period.

CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

CEQA Guidelines Section 15090 requires lead agencies to certify the final EIR prior to approving a project. The lead agency decision making body shall certify that (i) the Final EIR has been completed in compliance with CEQA; (ii) that the Final EIR was presented to the decision-making body, which reviewed and considered the information contained in the Final EIR prior to approving the project; and (iii) that the Final EIR reflects the lead agency's independent judgment and analysis.

For the proposed project, the City Council shall be the City's ultimate decision-making body. The Council will therefore review and consider the Final EIR and make a determination regarding whether the document is "adequate and complete." In general, a Final EIR meets this standard if:

1. The EIR shows a good faith effort at full disclosure of environmental information; and
2. The EIR provides sufficient analysis to allow decisions to be made regarding the proposed project in contemplation of environmental considerations.

The level of detail contained throughout the EIR is intended to be consistent with Section 15151 of the CEQA Guidelines and recent court decisions, which provide the standard of adequacy on which the document is based. The Guidelines state as follows:

"An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of the environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

Following review and consideration of the Final EIR, the City may take action to approve, modify, or reject the project. As part of project approval, the City also is also required to adopt a Mitigation Monitoring and Reporting Program, as described below, prepared in accordance with Public Resources Code Section 21081.6(a) and CEQA Guidelines Section 15097. This Mitigation Monitoring and Reporting Program must include all of the mitigation measures that have been incorporated into or imposed upon the project to reduce or avoid significant effects on the environment, and would be designed to ensure that these measures are actually carried out during project implementation.

USES OF THE EIR AND REQUIRED AGENCY APPROVALS

The City of Fresno will be the Lead Agency for the proposed project, pursuant to the State Guidelines for Implementation of CEQA, Section 15050. Other agencies may be required to issue permits or approve certain aspects of the proposed project.

Actions that would be required from the City include, but are not limited to, the following:

- Certification of the EIR;
- Adoption of the Mitigation Monitoring and Reporting Program;
- Approval of City of Fresno General Plan Amendments;
- Approval of City of Fresno rezoning;
- Approval of Specific Plan;
- Approval of Development Agreement;
- Approval of future tentative and final maps;
- Approval of future improvement plans;
- Approval of future grading plans;
- Approval of future building permits;
- Approval of future site plan and design review;
- City review and approval of future project utility plans.


The other governmental agencies that may require approvals in connection with the project include, but are not limited to, the following:

- California Department of Fish and Wildlife;
- California Department of Transportation;
- Central Valley Regional Water Quality Control Board - Storm Water Pollution Prevention Plan approval prior to construction activities pursuant to the Clean Water Act;
- San Joaquin Valley Air Pollution Control District - Approval of construction-related air quality permits;
- San Joaquin Valley Air Pollution Control District - Authority to Construct, Permit to Operate for stationary sources of air pollution;
- State Water Resources Control Board.

AREAS OF POTENTIAL IMPACTS

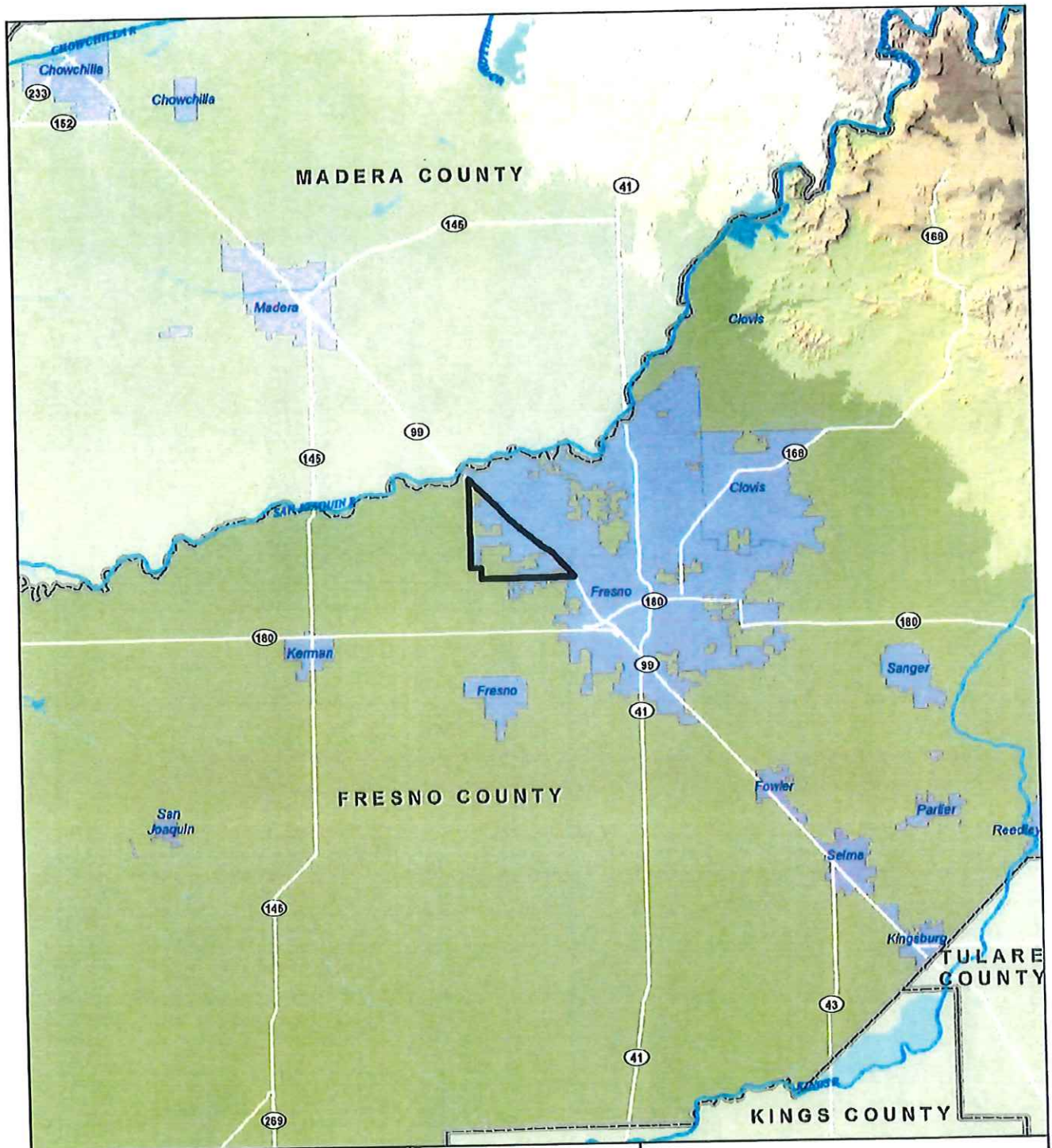
An Initial Study has not been prepared for this project. All environmental topics identified in Appendix G of the State CEQA Guidelines will be analyzed in the EIR, including: Aesthetics, Agricultural and Forest Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gases and Climate Change, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities, Wildfire, Cumulative Impacts, and Growth Inducing Impacts.

Date: June 28, 2019




Signature:  MPA

Name/Title: Rodney L. Horton, MPA, Project Planner

Phone/Email: 559-621-8181/Rodney.Horton@fresno.gov



Legend

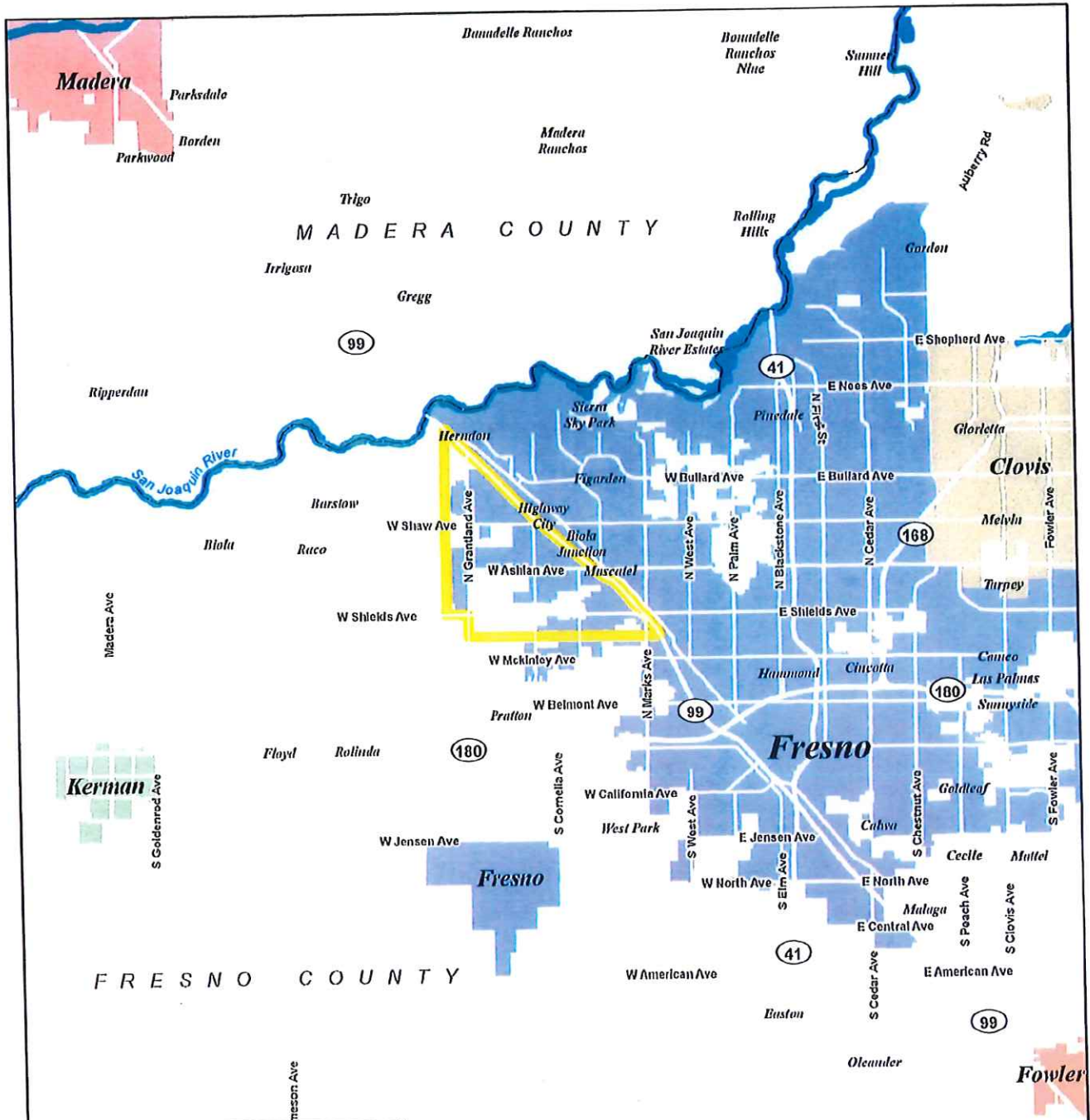
-  Specific Plan of the West Area
-  City Area
-  County Boundary



CITY OF FRESNO
SPECIFIC PLAN OF THE WEST AREA

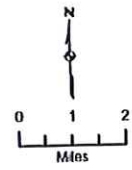
Figure 1. Regional Location Map

Sources: CalAtlas, Madera County, Fresno County Map date: May 3, 2018.



Legend

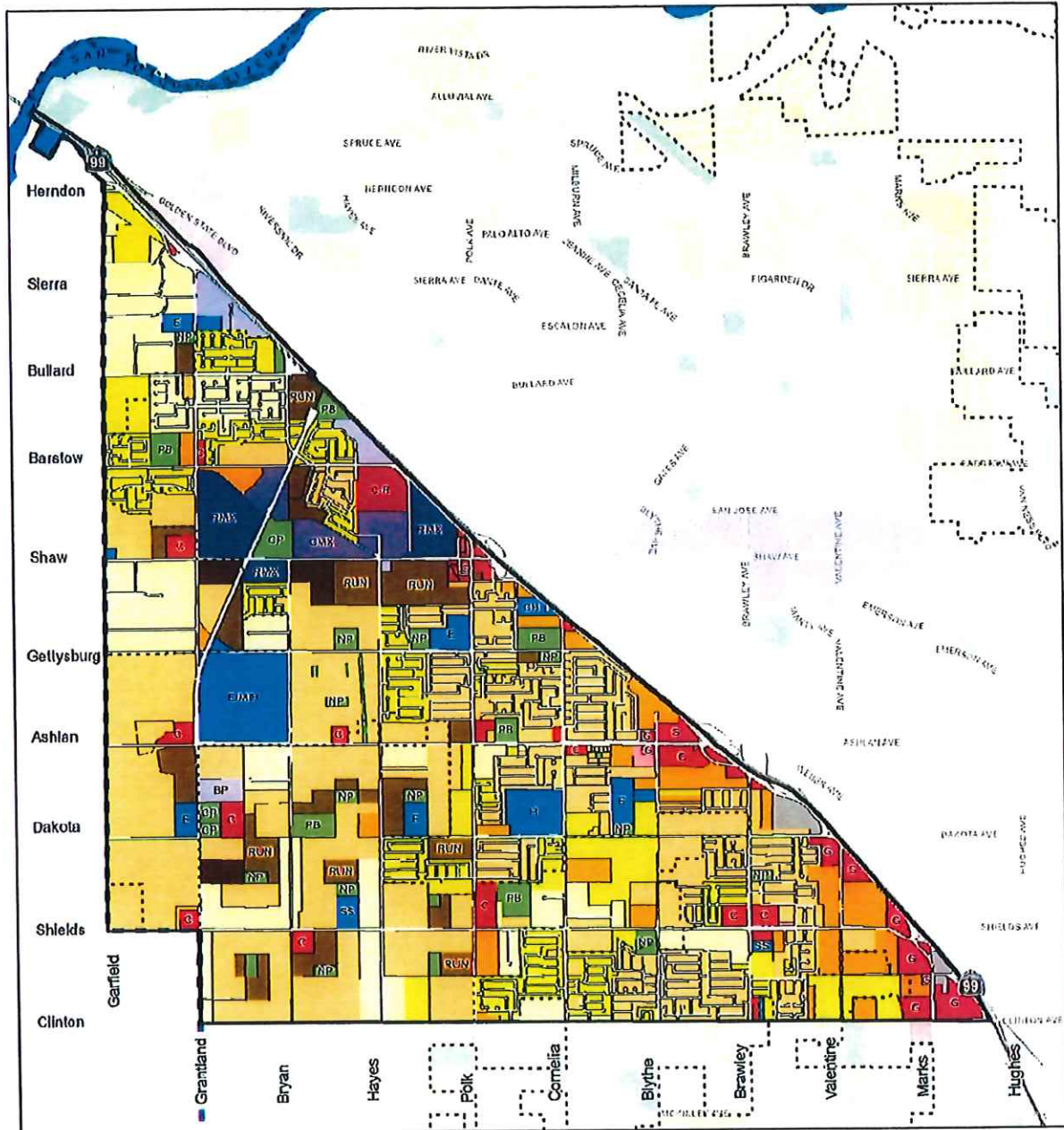
- Specific Plan of the West Area Boundary
- County Boundary
- City Areas**
- Clovis
- Fowler
- Fresno
- Kerman
- Madera



**CITY OF FRESNO
SPECIFIC PLAN OF THE WEST AREA**

Figure 2. Vicinity Map

Sources: Fresno County; Madera County, Cal Atlas. Map date: May 7, 2019.

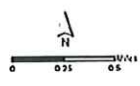


- BOUNDARIES**
- City Limits
 - West Area Specific Plan Boundary
 - Sphere Of Influence
- RESIDENTIAL**
- Low Density (1-3.5 D.U./acre)
 - Medium Low Density (3.5-6 D.U./acre)
 - Medium Density (5.0-12 D.U./acre)
 - Medium High Density (12-16 D.U./acre)
 - Urban Neighborhood (16-30 D.U./acre)
 - High Density (30-45 D.U./acre)
- PUBLIC FACILITIES**
- Public/Quasi-public Facility
 - Special School
 - Elementary School
 - Elementary, Middle & High School
 - High School
 - Church
 - Fire Station

- EMPLOYMENT**
- Office
 - Business Park
 - Light Industrial
- MIXED USE**
- Corridor/Center Mixed Use
 - Regional Mixed Use
- OPEN SPACE**
- Community Park
 - Open Space - Ponding Basin
 - Neighborhood Park
 - Open Space
 - Park
- COMMERCIAL**
- Community
 - Recreation
 - General

**CITY OF FRESNO
SPECIFIC PLAN OF THE WEST AREA**

Figure 4. Existing General Plan Land Use Designations



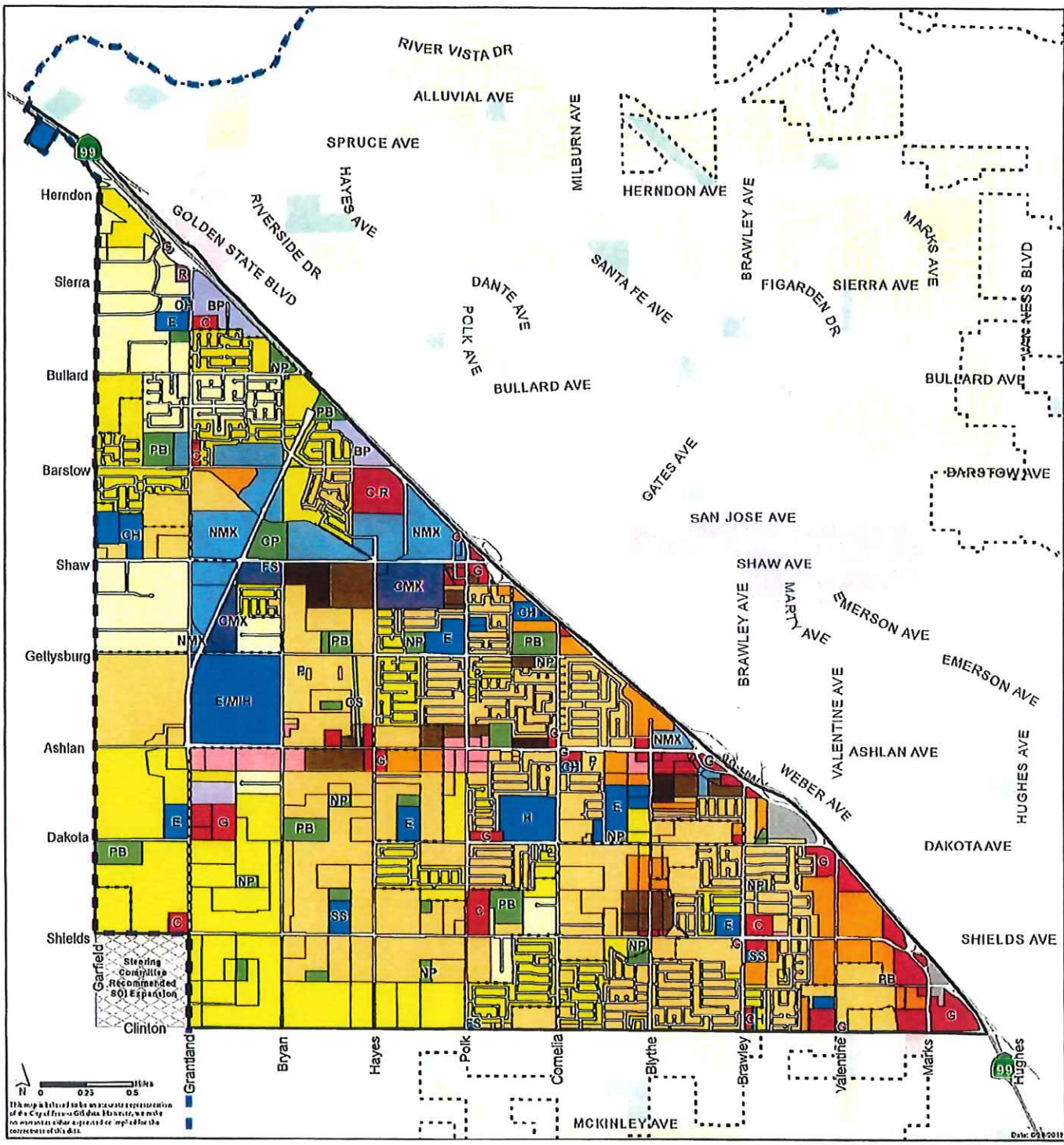


Figure 6. Proposed General Plan Land Use Designations

<p>RESIDENTIAL</p> <ul style="list-style-type: none"> 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) <p>COMMERCIAL</p> <ul style="list-style-type: none"> Community Recreation General Regional 	<p>EMPLOYMENT</p> <ul style="list-style-type: none"> Office Business Park Light Industrial <p>MIXED USE</p> <ul style="list-style-type: none"> Neighborhood Mixed Use Corridor/Center Mixed Use Regional Mixed Use 	<p>OPEN SPACE</p> <ul style="list-style-type: none"> Community Park Pocket Park Neighborhood Park Open Space Park Ponding Basin 	<p>PUBLIC FACILITIES</p> <ul style="list-style-type: none"> Public/Quasi-public Facility Special School Elementary School Elementary & Middle School Elementary, Middle & High School High School Church Fire Station <p>BOUNDARIES</p> <ul style="list-style-type: none"> Fresno City Limits Specific Plan of the West Area Sphere Of Influence
---	--	--	---

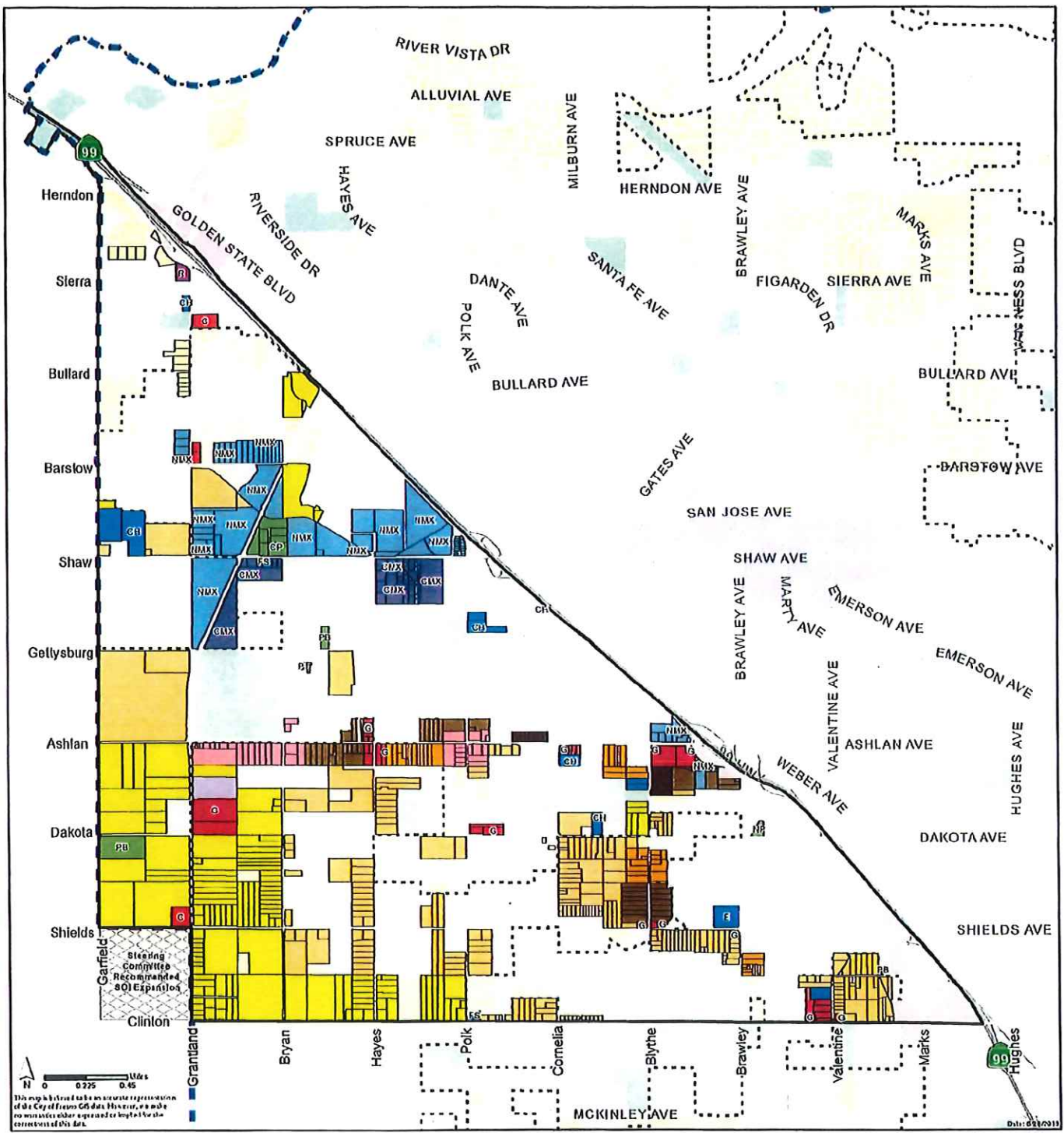


Figure 7. Parcels Proposed for Change in Proposed Land Use Map

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
- General
- Regional

EMPLOYMENT

- Office
- Business Park

MIXED USE

- Neighborhood Mixed Use
- Corridor/Center Mixed Use

OPEN SPACE

- Community Park
- Neighborhood Park
- Park
- Ponding Basin

PUBLIC FACILITIES

- Public/Quasi-public Facility
- Elementary School
- Church
- Fire Station

BOUNDARIES

- Specific Plan of the West Area
- Fresno City Limits
- Sphere Of Influence

Date: 03/15/2015
Source: City of Fresno



County of Fresno

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

May 1, 2025

Casey Lauderdale, Supervising Planner
casey.lauderdale@fresno.gov
City of Fresno, Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
SUBJECT: WANSP City of Fresno

Dear Ms. Lauderdale,

The County of Fresno appreciates the opportunity to review and comment on the subject project being reviewed by the City of Fresno. The proposed development of 7,077-acres to include up to 83,129 dwelling units, approximately 1,372.3 acres of non-residential uses, and approximately 338.95 acres of park or open space. The project location is generally west of Highway 99, north of Clinton Avenue, east of Garfield Avenue, and south of the San Joaquin River.

The documents received for this review were circulated to our various Fresno County Public Works and Planning divisions. See comments below.

Fresno County Development Engineering:

- The subject area is within the Fresno Metropolitan Flood Control District (FMFCD) Drainage Zone and Boundary. FMFCD should be consulted regarding any requirements they may have for the proposed development.

Fresno Metropolitan Flood Control District
5469 E. Olive Avenue
Fresno, CA 93727
(559) 456-3292
developmentreview@fresnofloodcontrol.org

Fresno County Road Maintenance and Operations:

All previously submitted comments from March 2022 shall remain applicable for this revision. I have included the previously submitted comments below.

- The County of Fresno Road Maintenance & Operation Division requests review of any transportation studies associated with future developments within the West Area Neighborhoods Specific Plan that will result in impacts to County roads.

- As the City of Fresno annexes fragmented sections of the West Area Neighborhoods, the City should annex the full road right-of-way width fronting any future developments that are within or bordering the proposed Specific Plan to avoid any shared roads with the County of Fresno.
- Traffic studies shall evaluate for consistency of right-of-way and classifications of surrounding County roads and the circulation between neighboring cities.

Fresno County Transportation Planning:

- The proposed specific plan has the potential to significantly impact on the county's transportation network. It is essential to ensure that the plan aligns with regional mobility goals, mitigates traffic congestions, and enhances connectivity between local and county roadways. Considerations should include roadway capacity, traffic flow, and multimodal transportation options to support anticipated growth. Additionally, coordination with county transportation agencies will be necessary to assess potential impacts on county-maintained infrastructure and identify opportunities for regional transportation enhancements. At this time, the Transportation Planning Unit requests to be included in the review process for any future transportation studies related to the WAN Specific Plan.

If you have further questions regarding this matter, please contact Hector Luna at hluna@fresnocountyca.gov

This concludes Fresno County comments on the proposed project.

Sincerely,

Arianna Brown

Arianna Brown, Planner -- Development Services and Capital Projects Division

"G:\4360Devs&Pln\PROJSEC\PROJDOCS\Environmental\OAR\City of Fresno\West Area Neighborhoods Specific Plan\2025\WANSP City of Fresno - Response Letter.docx"