

FRESNO VMT REDUCTION PROGRAM EIR RESPONSE TO COMMENTS DOCUMENT

**FRESNO, CALIFORNIA
STATE CLEARINGHOUSE NO. 2024091129**



September 2025

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STATE CLEARINGHOUSE NO. 2024091129**

Submitted to:

City of Fresno
Planning and Development Department
2600 Fresno Street
Fresno, California 93721

Prepared by:

LSA
2565 Alluvial Avenue, Suite 112
Clovis, California 93611
559.490.1210

Project No. 20241626



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1.0 INTRODUCTION

1.1 PURPOSE OF THE RESPONSE TO COMMENTS DOCUMENT

This document has been prepared to respond to comments received on the Draft Environmental Impact Report (Draft EIR) prepared for the Vehicle Miles Traveled (VMT) Reduction Program (proposed project) for the City of Fresno (City). The Draft EIR identifies the likely environmental consequences associated with implementation of the proposed project, and recommends mitigation measures to reduce potentially significant impacts. This Response to Comments (RTC) Document provides responses to comments on the Draft EIR and makes revisions to the Draft EIR, as necessary, in response to those comments or to make clarifications in the Draft EIR. This document, together with the Draft EIR, constitutes the Final EIR for the proposed project.

1.2 ENVIRONMENTAL REVIEW PROCESS

According to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft EIR.

The City circulated a Notice of Preparation (NOP) to solicit input from responsible and trustee agencies regarding the scope and content of the Draft EIR, as well as identify potential areas of controversy. The NOP was published on September 27, 2024, and was distributed to local, regional, and State agencies. A scoping session for the preparation of the Draft EIR was held at 5:00 p.m. on October 21, 2024. Comments received by the City on the NOP were taken into account during the preparation of the Draft EIR.

The Draft EIR was made available for local public review for 45 days beginning on July 2, 2025, and ending on August 15, 2025. The Draft EIR and an announcement of its availability were posted electronically on the City's website, and hard copies were available for public review at Fresno City Hall and the Central Branch of the Fresno County Public Library. Additionally, a notice of the Draft EIR's availability was posted in the Fresno Bee. The Draft EIR was also distributed to State responsible and trustee agencies for 45 days beginning on July 7, 2025, and ending on August 20, 2025.

During the public review period for the Draft EIR, the City received five comment letters. Copies of all written comments received during the comment period are included in Appendix E, Public Comment Letters on the Draft EIR, of this document.

1.3 DOCUMENT ORGANIZATION

This RTC Document consists of the following chapters:

- **Chapter 1.0: Introduction.** This chapter discusses the purpose and organization of this RTC Document and summarizes the environmental review process for the project.
- **Chapter 2.0: Draft EIR Commenters.** This chapter contains a list of agencies and organizations who submitted written comments on the Draft EIR during the public review period.

- **Chapter 3.0: Comments and Responses.** This chapter contains a matrix that includes text of each CEQA-related comment received on the Draft EIR during the public review period, and a written response to each comment. Reproductions of all comment letters are included in Appendix E, Public Comment Letters on the Draft EIR.
- **Chapter 4.0: Draft EIR Text Revisions.** Corrections to the Draft EIR that are necessary in light of the comments received and responses provided, or necessary to amplify or clarify material in the Draft EIR, are contained in this chapter. No significant changes have been made to the information contained in the Draft EIR as a result of the responses to comments, and no significant new information has been added that would require recirculation of the document.

2.0 DRAFT EIR COMMENTERS

This chapter presents a list of comment letters received during the public review period and describes the organization of the letters and comments that are provided in Chapter 3.0, Comments and Responses, of this document.

2.1 ORGANIZATION OF COMMENT LETTERS AND RESPONSES

Chapter 3.0 includes a matrix of each CEQA-related comment received on the Draft EIR during the public review period, and a written response to each comment. Reproductions of all comment letters are included in Appendix E, Public Comment Letters on the Draft EIR. The written comments are grouped by the affiliation of the commenter, as follows: State Agencies (A), Local Agencies (B), and Organizations and Interested Parties (C). The comment letters are numbered consecutively following the designations defined below:

State Agencies	A
Local Agencies	B
Organizations and Interested Parties	C

Comment letters are numbered and comments within each letter are numbered consecutively after the hyphen.

2.2 LIST OF COMMENTERS ON THE DRAFT EIR

Table 2.A provides a list of the State agencies, local agencies, and organizations and interested parties that commented on the Draft EIR prior to the close of the public comment period. The comments received have been organized by date received and in a manner that facilitates finding a particular comment or set of comments. Each comment letter received is indexed with a number below.

Table 2.A: List of Comments Received

State Agencies		
A1	California Department of Transportation, District 6	July 21, 2025
A2	California Department of Fish and Wildlife	August 20, 2025
Local Agencies		
B1	San Joaquin Valley Air Pollution Control District	August 6, 2025
Organizations and Interested Parties		
C1	Pacific Gas and Electric Company	July 7, 2025
C2	Building Industry Association of Fresno/Madera Counties, Inc.	August 15, 2025

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3.0 COMMENTS AND RESPONSES

Written responses to the comment letters received on the Draft Environmental Impact Report (Draft EIR) are provided in this chapter. The letters received during the public review period on the Draft EIR are provided in their entirety. The letters are immediately followed by responses keyed to the specific comments.

Please note that text within the letters that has not been numbered does not raise environmental issues or relate to the adequacy of the information or analysis within the Draft EIR and, therefore, no comment is enumerated or response required, per CEQA Guidelines Section 15132. In addition, when general support or opposition is given for the project, that comment is noted but no further analysis is provided in the response as the commenter is not questioning the adequacy of the information or analysis within the Draft EIR.

Where comments on the Draft EIR concern issues requiring technical expertise such as those related to air quality, the responses to comments, like the initial analysis in the Draft EIR, relies on the knowledge and professional analysis of qualified experts. This chapter also includes a Master Response intended to address comments related to a particular theme. In this case, a Master Response is included to provide a discussion of comments on the Project Description and the merits of the proposed project.

Where revisions to the Draft EIR text are called for, the page is set forth, followed by the appropriate revision. Added text is indicated with double-underlined text, and deleted text is shown in ~~strikeout~~ text. Text revisions to the Draft EIR are included in Chapter 4.0 of this Response to Comments (RTC) Document. Information provided in this RTC Document clarifies, amplifies, or makes minor modifications to the Draft EIR. No significant changes have been made to the information contained in the Draft EIR as a result of the comments received, and no significant new information has been added that would require recirculation of the document pursuant to State CEQA Guidelines, Section 15088.5.

3.1 MASTER RESPONSE: PROJECT DESCRIPTION AND PROJECT MERITS

Often during review of an EIR, members of the public raise issues that relate to the project itself or the project's community consequences or benefits (referred to here as "project merits"), rather than the environmental analyses or associated impacts and mitigation measures raised in the EIR. Comments received on the Draft EIR that raised issues related to project merits include implementation of the VMT Reduction Program and the mitigation fee. Lead Agency review of both environmental issues and project merits are important in the decision of what action to take on a project, and both are considered in the decision-making process for a project. However, a Lead Agency is only required by CEQA to respond to comments regarding significant environmental issues.

In accordance with Sections 15088 and 15132 of the CEQA Guidelines, a Final EIR must include a response to comments on the Draft EIR pertaining to significant environmental issues analyzed under CEQA. Several of the comments provided in response to the Draft EIR express an opinion about the components of the project or provide recommendations regarding the proposed project,

but do not pertain to the adequacy of the analysis or conclusions in the Draft EIR. Rather, these opinions relate to the merits of the project.

Section 15204 of the CEQA Guidelines provides direction for parties reviewing and providing comment on a Draft EIR, as follows:

In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.

Section 15204 continues in relation to the role of lead agencies responding to comments:

When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

Therefore, in accordance with Section 15204, the City is not required to respond to comments that express an opinion about the project merits and do not relate to environmental issues covered in the Draft EIR. Although such project merits opinion comments received during the EIR process do not require responses in the EIR, as previously noted, they do provide important input to the process of reviewing the project overall and will be considered by City decision-makers.

3.2 COMMENTS AND RESPONSES MATRIX

Table 3.A includes all CEQA-related comments received on the Draft EIR and a response to each comment. The text of each comment has been included in the matrix and includes any grammatical errors included in the original comment letter. Each comment letter is included in its entirety in Appendix E, Public Comment Letters on the Draft EIR.

Table 3.A: Comments and Responses Matrix

Letter/ Comment Number	Comment	Response
State Agencies		
A1	California Department of Transportation, District 6 (July 21, 2025)	
A1-1	Caltrans has completed the review of the Draft Environmental Impact Report for Vehicle Miles Traveled (VMT) Reduction Program proposing to implement a VMT Reduction Program to reduce VMT and associated greenhouse gas emissions, while streamlining the environmental compliance process for development projects that generate vehicle trips. The project site is located in the City of Fresno including surrounding sphere of influence. 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:	This comment provides an introduction to the comment letter and briefly summarizes the commenter's understanding of the proposed project. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
A1-2	1. Caltrans has completed its review of a Draft Environmental Impact Report (DEIR) to evaluate the potential environmental impacts resulting from implementation of the Fresno Vehicle Miles Travelled (VMT) Reduction Program for the City of Fresno. It should be noted in the DEIR Project Impacts (Index 4.16.3.2), that beyond or in addition to the use of the VMT metric, determining how the State Highway System may otherwise be affected by a land use project may still be necessary at times, particularly as it relates to the safety of the traveling public. Road safety reviews, that are not based on VMT, may be required. The Caltrans Local Developmental Review (LDR) - Safety Review Practitioners Guidance provides guidelines for the review of land use projects and plans affecting the State Highway System (SHS) within the LDR process. 2. Alternative transportation policies should be applied to the development. An assessment of multi-modal facilities should be conducted to develop an	This comment provides a series of comments regarding future projects in Fresno, as well as projects that could be constructed under the VMT Reduction Program. As noted in the Draft EIR, the proposed VMT Reduction Program aims to establish mitigation for future projects that exceed the City's VMT thresholds in the form of a mitigation bank. The program would identify, quantify, and prioritize applicable mitigation measures, and relevant VMT-reducing projects within Fresno to be funded by the proposed mitigation bank. The adoption of the proposed VMT Reduction Program would support future multi-modal or transportation improvements in accordance with the program. Future transportation improvement projects funded by the proposed VMT Reduction Program would be largely focused within developed areas, but the proposed improvements could still result in potentially significant impacts to the environment.

Table 3.A: Comments and Responses Matrix

Letter/ Comment Number	Comment	Response
	integrated multi-modal transportation system to serve and help alleviate traffic congestion caused by the project and related development in this area of the city. The assessment should include the following: a. Pedestrian walkways should link this Project to transit facilities, bicycle pathways and other walkways in the surrounding area. b. Coordinating connections to local and regional bicycle pathways should be done to further encourage the use of bicycles for commuter and recreational purposes. c. Transit service and bus stop accommodations should be extended to within ¼- mile of the Project site. 3. Caltrans recommends the Project implement “smart growth” principles regarding parking solutions, providing alternative transportation choices to residents and employees. Alternative transportation choices may include but are not limited to parking for carpools/vanpools, car-share and/or ride-share programs. 4. Based on Caltrans Vehicle Miles Traveled (VMT)-Focused Transportation Impact Study Guide, dated May 20, 2020, and effective as of July 1, 2020, Caltrans seeks to reduce single occupancy vehicle trips, provide a safe transportation system, reduce per capita VMT, increase accessibility to destinations via cycling, walking, carpooling, transit and reduce greenhouse gas (GHG) emissions. Caltrans recommends that the project proponent continue to work with the city to further implement improvements to reduce VMT and offer a variety of transportation modes. 5. The city should consider requiring the project to provide charging stations for electric vehicles and for freight trucking as part of the statewide efforts to reduce greenhouse gas emissions, reduce freight parking shortages and maintain the Federal Hours of Service regulations. 6. Due to severe truck parking shortages throughout the state and strict Federal Hours of Service regulations that limit the amount of time a truck driver can spend driving per day, many truck drivers cannot find safe and reliable truck parking spaces, and therefore park in unauthorized and/or unsafe areas. Constructing adequate truck parking on-site can alleviate the unauthorized/unsafe truck parking demand on existing facilities. On-site parking for freight trucks will also strive to ensure a secure and reliable area for	All future transportation improvements, including those implemented as part of future development projects, would be required to undergo environmental review under CEQA. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.

Table 3.A: Comments and Responses Matrix

Letter/ Comment Number	Comment	Response
	extended or overnight parking to help maintain adherence to the Federal Hours of Service regulations. On-site parking for freight trucks is adequate when on-site facilities include, at a minimum: restrooms, lighting, trash facilities, drinking water, showers, and food sellers (such as, but not limited to a food court, restaurant, food truck) or vending machines. 7. The city should consider requiring the Project to implement on-site parking for freight trucks within the Project boundaries, that truck drivers can utilize for extending parking periods before loading or after unloading. 8. The city should consider promoting the leveraging of strategic investments to maintain and modernize a multimodal freight transportation system with innovative approaches, including advanced technology to optimize integrated network efficiency, improve travel time reliability, and achieve sustainable congestion reduction. 9. To ensure that VMT-reducing projects do not unintentionally impact operations on the SHS, Caltrans requests early consultation during project-level environmental review and coordination on any improvements located adjacent to or affecting SHS facilities. Caltrans also recommends that the City provide clear reporting on the use of mitigation fees and the performance of funded projects, including metrics for trip reduction, mode share, and network connectivity. In addition, the City is encouraged to include freight-focused VMT reduction strategies, such as last-mile logistics improvements and off-peak delivery options, and to adopt equity-based project selection criteria that prioritize investments in disadvantaged communities and expand access to multi-modal transportation choices.	
A2	California Department of Fish and Wildlife (August 20, 2025)	
A2-1	The California Department of Fish and Wildlife (CDFW) received a DEIR from the City of Fresno, as Lead Agency, for the above-referenced Program pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines. Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Program that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Program that CDFW, by law, may be required to	This comment provides an introduction to the comment letter and summarizes the role of the California Department of Fish and Wildlife (CDFW) in reviewing the Draft EIR as a Responsible Agency under CEQA. This comment also identifies the topics of other special-status species, nesting birds, unlisted species, and the Native Plant Protection Act, as issues of general concern of the CDFW. However, this comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental

Table 3.A: Comments and Responses Matrix

Letter/ Comment Number	Comment	Response
	carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code. CDFW ROLE CDFW is California’s Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802.). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, reasonably foreseeable future projects may be subject to CDFW’s lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of reasonably foreseeable future projects may result in “take” as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required. Other Special-Status Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened on any State or federal list pursuant to CESA and/or the federal Endangered Species Act (ESA) to be considered Endangered, Rare, or Threatened under CEQA. If a species can be shown to meet the criteria specified in the CEQA Guidelines (Cal. Code Regs., tit. 14, Chapter 3, § 15380), it should be fully considered in the environmental analysis for the Program. Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds.	issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.

Table 3.A: Comments and Responses Matrix

Letter/ Comment Number	Comment	Response
	Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened on any State or federal list pursuant to CESA and/or the federal Endangered Species Act (ESA) to be considered Endangered, Rare, or Threatened under CEQA. If a species can be shown to meet the criteria specified in the CEQA Guidelines (Cal. Code Regs., tit. 14, Chapter 3, § 15380), it should be fully considered in the environmental analysis for the Program. Native Plant Protection Act: The Native Plant Protection Act (NPPA) (Fish & G. Code §1900 et seq.) prohibits the take or possession of state-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. Take of state-listed rare and/or endangered plants due to Program activities may only be permitted through an Incidental Take Permit (ITP) or other authorization issued by CDFW pursuant to California Code of Regulations, Title 14, section 786.9 subdivision (b).	
A2-2	PROGRAM DESCRIPTION SUMMARY Proponent: City of Fresno Objective: The proposed Program intends to create a VMT Reduction Program to establish mitigation for future projects that exceed the City's VMT thresholds in the form of a mitigation bank. The VMT Reduction Program includes two major components that can be applied, individually or in combination, to new development with VMT impacts: an Urban Design Calculator, which estimates potential VMT reductions for development projects through incorporation of various design elements; and a mitigation fee program. The mitigation impact fee would allow new development to mitigate VMT impacts by making "fair share" payments into a mitigation bank to cover the cost of the identified VMT-reducing projects in the proposed VMT Reduction Program. The VMT Reduction Program would identify relevant transportation demand management strategies and VMT-reducing projects within the City of Fresno to be funded by mitigation fees from	This comment briefly summarizes the commenter's understanding of the proposed project and the location of the proposed project. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.

Table 3.A: Comments and Responses Matrix

Letter/ Comment Number	Comment	Response
	developments that trigger potentially significant VMT impacts under CEQA. Potential VMT-reducing measures may include active transportation improvements, multi-modal transportation programs, and improved street connectivity, including bicycle, pedestrian, and transit facilities. The Program intends to streamline the Senate Bill 743 compliance process for development projects while funding future VMT improvement projects. Location: The proposed Program will apply to development within the city limits of Fresno. The City of Fresno is located in Fresno County and covers an area of approximately 113 square miles. To the north of Fresno is Madera County, to the northeast and adjacent to Fresno, is the City of Clovis. Unincorporated land is located to the east, south, and west of Fresno.	
A2-3	COMMENTS AND RECOMMENDATIONS CDFW offers the following comments and recommendations to assist the City of Fresno in adequately identifying and/or mitigating the Program's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the DEIR prepared for this Program. CDFW previously commented on the Notice of Preparation for this Program on October 29, 2024, with recommendations related to species habitat assessments and surveys, cumulative impacts analyses, CEQA alternative analysis, federally listed species consultation, botanical surveys, nesting birds, and the potential need to notify for potential impacts to streams pursuant to Fish and Game Code section 1600 et seq.	This comment provides an introduction to CDFW's comments on the Draft EIR, but does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
A2-4	Special-Status Species Aerial imagery and species occurrence records from the California Natural Diversity Database (CNDDDB) (CDFW 2025), CDFW's familiarity with biological resources in the Program area, and given that the Program encompasses the entirety of the city limits of Fresno, potential impacts to special-status species exists and should be analyzed during review of projects arising from the VMT Program. CDFW concurs with the content of Table 4.4.A and 4.4.B included in Section 4.4 of the DEIR for the Program which lists special-status plant and wildlife	This comments states that CDFW concurs with the methodology in the Draft EIR that was used to identify potential impacts to biological resources, as well as the potential impacts identified and mitigation measures recommended to be implemented. The CDFW recommends adding additional, clarifying information to Mitigation Measure BIO-1 and Mitigation Measure BIO-4 to strengthen the effectiveness of these mitigation measures.

Table 3.A: Comments and Responses Matrix

Letter/ Comment Number	Comment	Response
	species within the Project vicinity. As noted in the analysis and repeated throughout the Project Impacts subsection, these biological resources would need to be evaluated and addressed as part of any project-specific reviews and approvals. Additionally, CDFW agrees with the methodology that future potential projects should be analyzed on a project-specific basis for potential biological resources impacts with site-specific information and implement measurable mitigation measures that would reduce impacts to less than significant levels as needed. Biological mitigation measure BIO-1 states that transportation improvement projects funded by the proposed Program subject to CEQA review and with the potential to reduce or eliminate habitat for native plant and wildlife species or sensitive habitats shall provide a Biological Resources Assessment (BRA). Biological mitigation measure BIO-4 states that pre-construction nesting bird clearance surveys will be conducted no more than 14 days prior to the start of any vegetation removal or ground disturbing activities. CDFW concurs with this methodology as appropriate for the majority of potential projects that are expected to occur within existing disturbed rights-of-way in developed areas; however, CDFW recommends strengthening the narrative in BIO-1 and BIO-4 by including species-specific protocol-level surveys as part of the BRA and pre-construction surveys, when appropriate. The additional site-specific evaluation will ensure that potential impacts from projects that occur outside of the existing rights-of-way areas are eliminated or minimized.	In response to this comment, and included in Chapter 4.0 of this RTC Document, Mitigation Measure BIO-1 and Mitigation Measure BIO-4 have been revised, as shown below. The revisions provide clarifications and do not constitute significant new information requiring recirculation of the Draft EIR. Mitigation Measure BIO-1, shown on page 4.4-22 of the Draft EIR has been revised as follows: Mitigation Measure BIO-1: Transportation improvements funded by the proposed Vehicle Miles Traveled Reduction Program subject to California Environmental Quality Act (CEQA) review, and with the potential to reduce or eliminate habitat for native plant and wildlife species or sensitive habitats, shall provide a Biological Resources Assessment prepared by a qualified biologist for review and approval by the City of Fresno. The assessment shall include biological field survey(s) of the project site to characterize the extent and quality of habitat that would be impacted by development. Surveys shall be conducted by qualified biologists and/or botanists in accordance with California Department of Fish and Wildlife and/or United States Fish and Wildlife Services survey protocols for target species. <u>Specific mitigation measures for direct or incidental impacts to special-status species shall be determined on a case-by-case basis through agency consultation during the review process for discretionary projects, and shall be consistent with survey protocols and mitigations measures recommended by the agency at the time of consultation.</u> If no special status/sensitive species, sensitive habitats/natural communities, or federally protected wetlands are observed during the field survey, then no further mitigation will be required. If biological resources are documented on the project site, the project proponent shall comply with the applicable requirements of the regulatory agencies and shall apply mitigation determined through the agency permitting process.

Table 3.A: Comments and Responses Matrix

Letter/ Comment Number	Comment	Response
		Mitigation Measure BIO-4, shown on page 4.4-24 of the Draft EIR has been revised as follows: Mitigation Measure BIO-4: A pre-construction nesting bird clearance survey shall be conducted by a qualified biologist no more than fourteen (14) days prior to the start of any vegetation removal or ground disturbing activities associated with a transportation improvement project. The survey shall be conducted by a qualified biologist and cover all suitable nesting habitat within the project impact area, and areas within a biologically defensible buffer zone surrounding the project impact area. Further, if an active bird nest is found, the qualified biologist should identify the specific bird species and establish a “no-disturbance” buffer around the active nest to avoid potential direct and indirect impacts. It is further recommended that the qualified biologist periodically monitor any active bird nests to determine if project-related activities disturb the birds and if the “no disturbance” buffer should be increased. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, project activities within the “no-disturbance” buffer may occur following an additional survey by the qualified biologist to search for any new nests in the restricted area. <u>Specific mitigation measures for direct or incidental impacts to avian species protected under Fish and Game Code 3500 and the Migratory Bird Treaty Act (MBTA) shall be determined on a case-by-case basis through agency consultation during the review process for discretionary projects, and shall be consistent with survey protocols and mitigations measures recommended by the agency at the time of consultation.</u>
A2-5	California Endangered Species Act Reasonably foreseeable future projects tiered from this Program may be subject to CDFW’s regulatory authority pursuant to the California Endangered Species Act (CESA). In the event that species listed under CESA are detected during surveys, consultation with CDFW is warranted to discuss how to implement the project and avoid “take,” or if avoidance is not feasible, to acquire a State ITP, pursuant to	This comment states that any future projects proposed under the proposed VMT Reduction Program may be subject to regulatory authority under the California Endangered Species Act (CESA). As identified in the Draft EIR, all transportation improvements, including those implemented as part of development projects, would be required to undergo separate environmental review under CEQA to

Table 3.A: Comments and Responses Matrix

Letter/ Comment Number	Comment	Response
	Fish and Game Code section 2081 subdivision (b), prior to any ground disturbing activities. In addition, CDFW recommends that mitigation measures for the CESA listed species be fully addressed in the CEQA document prepared for any future project tiered from this Program.	evaluate project-specific impacts and any required mitigation. In addition, Mitigation Measure BIO-1 provides further direction to address potential project-specific impacts. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
A2-6	California Natural Diversity Database (CNDDDB) Please note that the CNDDDB is populated by voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDDB but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record, or lack of recent occurrence records, in the CNDDDB does not mean that a species is not present. All projects tiered from this Program should adequately assess any potential project-related impacts to biological resources by ensuring biological surveys are conducted by a qualified wildlife biologist during the appropriate survey period(s) and using the appropriate protocol survey methodology as warranted in order to determine whether or not any special-status species are present at or near the project area.	This comment states that any future projects proposed under the proposed VMT Reduction Program should assess potential site-specific impacts related to biological resources. As identified in the Draft EIR, all transportation improvements, including those implemented as part of development projects, would be required to undergo separate environmental review under CEQA to evaluate project-specific impacts and include any required mitigation. In addition, Mitigation Measure BIO-1 provides further direction to address potential project-specific impacts. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
A2-7	Federally Listed Species CDFW recommends projects tiered from this Program consult with the USFWS on potential impacts to federally listed species. Take under the Federal Endangered Species Act (ESA) is more broadly defined than CESA; take under the ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS is advised well in advance of any ground disturbing activities.	This comment recommends that any future projects proposed under the proposed VMT Reduction Program should consult with the United States Fish and Wildlife Services (USFWS) related to potential impacts to federally listed species. As identified in the Draft EIR, all transportation improvements, including those implemented as part of development projects, would be required to undergo separate environmental review under CEQA to evaluate project-specific impacts and any required mitigation. In addition, Mitigation Measure BIO-1 requires that a Biological Resources Assessment (BRA) be prepared for any transportation improvements funded by the proposed VMT Reduction Program that has the potential to reduce or

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		eliminate habitat for native plant and wildlife species or sensitive habitats. As part of a BRA prepared by a qualified biologist, consultation with the USFWS would occur if federally listed species are identified at the project level. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
A2-8	Lake and Streambed Alteration Reasonably foreseeable future projects tiered from this Program may be subject to CDFW's regulatory authority pursuant to Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires project proponents to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake; or (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial in nature. For additional information on notification requirements, please contact our staff in the Lake and Stream Alteration Program at (559) 243-4593, or R4LSA@wildlife.ca.gov. CDFW therefore recommends that the FEIR for this Program include information related to these requirements of Fish and Game code and advise that projects tiered from this Program retain a qualified biologist to determine if potential impacts to streams may require the need to notify pursuant to Fish and Game Code section 1602.	This comment recommends that any future projects under the proposed VMT Reduction Program may be subject to CDFW's regulatory authority related to lake and streambed alterations. As discussed under Impact Discussion BIO-3, beginning on page 4.4-23 of the Draft EIR, all future transportation improvements, including those implemented as part of future development projects, would be required to undergo project-level environmental review under CEQA and be evaluated on a project-specific level with site-specific analysis and implement mitigation measures, as needed. As required by Mitigation Measure BIO-1, a Biological Resources Assessment may be required at the project level to address potential impacts to wetland habitat, including potential impacts to streams. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
A2-9	ENVIRONMENTAL DATA CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species	This comment requests that any information developed as a part of subsequent environmental documentation be incorporated into a database. This comment is noted, and, as future site-specific analyses are conducted consistent with Mitigation Measure BIO-1 and Mitigation BIO-4, qualified biologists are expected to fulfill the requirements of reporting site-specific information. This comment

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	and natural communities detected during project surveys to the CNDDDB. The CNDDDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data . The completed form can be mailed electronically to the CNDDDB at the following email address: CNDDDB@wildlife.ca.gov . The types of information reported to the CNDDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals .	does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
A2-10	FILING FEES If it is determined that the Program or subsequent projects have the potential to impact biological resources, an assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).	This comment notes the requirement for the payment of filing fees associated with filing of a Notice of Determination (NOD) for the proposed VMT Reduction Program and any subsequent environmental documentation. This comment is noted, but this comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
A2-11	CONCLUSION CDFW appreciates the opportunity to comment on the DEIR to assist City of Fresno in identifying and mitigating Program impacts on biological resources. More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). If you have any questions regarding this letter or further coordination, please contact Marile Colindres, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 974-3452, or by electronic mail at marile.colindres@wildlife.ca.gov .	This comment provides a conclusion to the comment letter. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.

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Local Agencies		
B1	San Joaquin Valley Air Pollution Control District (August 6, 2025)	
B1-1	The San Joaquin Valley Air Pollution Control District (District) has reviewed the Draft Environmental Impact report (DEIR) from the City of Fresno (City) for the Vehicle Miles Traveled (VMT) Reduction Program. Per the DEIR, the project consists of the establishment of a VMT Reduction Program intended to reduce Citywide VMT by establishing mitigation for future development projects in Fresno through developing an Urban Design Calculator that estimates potential VMT reductions for development projects through incorporation of various design elements and the use of a mitigation fee which would be used to fund VMT reducing projects throughout the City (Project). The Project covers development projects in Fresno, California. The Project includes area within one of the communities in the state selected by the California Air Resources Board (CARB) for investment of additional air quality resources and attention under Assembly Bill (AB) 617 (Garcia) in an effort to reduce air pollution exposure in impacted disadvantaged communities. See Figure 1 below. The District offers the following comments at this time regarding the Project:	This comment provides an introduction to the comment letter and briefly summarizes the commenter’s understanding of the proposed project. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
B1-2	1) Ongoing Commitment to Strengthen Working Relationship The District appreciates the City’s ongoing commitment to strengthen the working relationship with the District, in identifying and mitigating impacts on air quality through the California Environmental Quality Act (CEQA) review process. Consistent with this cooperative effort and in order to address air quality impacts and concerns prior to future development projects occurring, the District recommends that the City develop administrative mechanisms and policies that ensure consistency in providing the District with information about projects under consideration by the City, such as land use designation, project size, and proximity to sensitive receptors and existing emission sources. To aid the City in determining a project’s potential impacts, the District recommends the City provide an assessment evaluating potential project construction and operation related to air quality impacts to the District as early as possible. Additionally, the District is available to work with the City and project applicants on future development projects to address air quality impacts and concerns. The District encourages the	This comment recommends that the City provide an assessment evaluating potential project-level construction and operation related to air quality impacts. As noted in the Draft EIR, beginning on page 4.3-30, the proposed VMT Reduction Program would be consistent with the City’s General Plan as it would preserve acceptable air quality and would improve a transportation network that is sensitive to environmental issues. The proposed project would not affect Fresno’s growth projections because the proposed project does not include any development that would introduce population or substantial employment in Fresno. However, construction activities associated with these individual VMT-reducing improvement projects result in an increase in criteria pollutants. These construction-related emissions would be analyzed on a case-by-case basis. All transportation improvements, including those implemented as part of development projects, would be required to undergo separate environmental review under CEQA to evaluate project-specific

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	City to include guidance in relevant planning documents or development review procedures that advises project applicants to reach out and work with the District. The District's goal is to assist with enhancing project designs in the early stages of the planning process for a better overall project with minimized impact on air quality and early identification of feasible mitigation measures.	impacts and any required mitigation. The approved General Plan already includes several policies and objectives that direct coordination with the SJVAPCD to achieve compliance with State and federal air quality standards for criteria air pollutants, consistent with the District's goal of minimizing air quality impacts.
B1-3	2) Operational Funding Strategy Nearly all development projects within the San Joaquin Valley Air Basin, from program-level to individual projects have the potential to generate air pollutants, making it more difficult to attain state and federal ambient air quality standards. Land use decisions are critical to improving air quality within the San Joaquin Valley Air Basin because land use patterns greatly influence transportation needs, and motor vehicle emissions are the largest source of air pollution in the Valley. Land use decisions and project design elements such as preventing urban sprawl, encouraging mix-use development, and project design elements that reduce vehicle miles traveled (VMT) have proven to be beneficial for air quality. The District acknowledges that the Project will be incorporating strategies that reduce VMTs and the District recommends that the Project incorporate strategies that require the cleanest available heavy duty trucks, vehicles, and off-road equipment, including zero and near-zero technologies. VMTs can be reduced through encouragement of mix-use development, walkable communities, etc. Additional design element options can be found at: https://ww2.valleyair.org/media/ob0pweru/clean-air-measures.pdf In addition, the District recommends that the Project incorporate strategies that will advance implementation of the best practices listed in Tables 5 and 6 of California Air Resource Board's (CARB's) Freight Handbook Concept Paper, to the extent feasible. This document compiles best practices designed to address air pollution impacts as "practices" which may apply to the siting, design, construction, and operation of freight facilities to minimize health impacts on nearby communities. The concept paper is available at: https://www2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf	This comment acknowledges that, while projects in the San Joaquin Valley Air Basin have the potential to generate air pollutants, there are strategies and design elements that could be implemented to reduce VMT impacts and overall impacts to air quality. This comment also requests that strategies to address air pollution impacts at the project-level be incorporated into the proposed VMT Reduction Program. It should be noted that the proposed VMT Reduction Program does not propose any physical changes that would result in potential impacts on the environment all future transportation improvements, including those implemented as part of future development projects, would be required to undergo environmental review under CEQA. As such, implementation of project-level best practices would be applicable at the time that future transportation improvements identified in the proposed VMT Reduction Program are proposed, or when future development projects are proposed. As such, recommendations for the incorporation of best practices do not apply to the proposed VMT Reduction Program. The references provided in this comment do not change the findings of the Draft EIR and will be considered for future reference. Further, refer to the Master Response for a discussion of comments on the Project Description and project merits.

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B1-4	3) Project Siting The Project is intended to supplement the blueprint for future growth and provides guidance for the community's development. Without appropriate mitigation and associated policy, future development projects within the City may contribute to negative impacts on air quality due to increased traffic and ongoing operational emissions. Appropriate project siting helps ensure there is adequate distance between differing land uses, which can prevent or reduce localized and cumulative air pollution impacts from business operations that are in close proximity to receptors (e.g., residences, schools, health care facilities, etc.). The Project's siting-related goals, policies, and objectives should include measures and concepts outlined in the following resources: ● CARB's Air Quality and Land Use Handbook: A Community Health Perspective. The document includes tables with recommended buffer distances associated with various types of common sources (e.g., distribution centers, chrome platers, gasoline dispensing facilities, etc.), and can be found at: https://ww2.arb.ca.gov/our-work/programs/resource-center/strategy-development/land-use-resources ● CARB's Freight Handbook Concept Paper: This document compiles best practices designed to address air pollution impacts, which may apply to the siting, design, construction, and operation of freight facilities to minimize health impacts on nearby communities, and can be found at: https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf	Refer to the response to Comment B1-4. All construction activities associated with individual VMT-reducing improvement projects identified in the proposed VMT Reduction Program would be analyzed on a case-by-case basis, including improvements implemented as part of future development projects, and would be required to undergo environmental review under CEQA. The references provided in this comment do not change the findings of the Draft EIR and will be considered for future reference.
B1-5	4) Assembly Bill 617 AB 617 requires CARB and air districts to develop and implement Community Emission Reduction Programs (CERPs) in an effort to reduce air pollution exposure in impacted disadvantaged communities, like those in which the Project is located. The South Central Fresno AB 617 community is one of the statewide communities selected by CARB for development and implementation of a CERP. Following extensive community engagement and collaboration with the Community Steering Committee, the CERP for the South Central Fresno	This comment states that proximity of emission sources to nearby sensitive receptors like schools, homes, day care centers, and hospitals, and the potential future industrial development within the community that may exacerbate the cumulative exposure burden for community residents. The comment provides a reference to the Community Emission Reduction Program (CERP) approved for South Central Fresno. As noted in the Draft EIR, the proposed VMT Reduction Program aims to establish mitigation for future projects that exceed the City's VMT thresholds in the form of a mitigation bank. The program would identify, quantify, and prioritize applicable

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	Community was adopted by the District’s Governing Board in September 2019 and by CARB in February 2020. During the development of the CERP, the Community Steering Committee expressed concerns regarding the proximity of emission sources to nearby sensitive receptors like schools, homes, day care centers, and hospitals, and the potential future industrial development within the community that may exacerbate the cumulative exposure burden for community residents. The Community Steering Committee also expressed the desire for more meaningful avenues of engagement surrounding the land-use decisions in the area. As these issues can most effectively be addressed through strong partnerships between community members and local land-use agencies. For more information regarding the CERP approved for South Central Fresno, please visit the District’s website at: https://community.valleyair.org/selected-communities/south-central-fresno	mitigation measures, and relevant VMT-reducing projects within Fresno to be funded by the proposed mitigation bank. The adoption of the proposed VMT Reduction Program would support future multi-modal or transportation improvements in accordance with the program. All construction activities associated with individual VMT-reducing improvement projects identified in the proposed VMT Reduction Program would be analyzed on a case-by-case basis to ensure consistency with the goals of the CERP to reduce potential impacts. All future transportation improvements, including those implemented as part of future development projects, would be required to undergo environmental review under CEQA. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
B1-6	5) Truck Routing Truck routing involves the assessment of which roads Heavy Heavy-Duty (HHD) trucks take to and from their destination, and the emissions impact that the HHD trucks may have on residential communities and sensitive receptors. The District recommends the City evaluate HHD truck routing patterns for future development projects, with the aim of limiting exposure of residential communities and sensitive receptors to emissions. This evaluation would consider the current truck routes, the quantity and type of each truck (e.g., Medium Heavy-Duty, HHD, etc.), the destination and origin of each trip, traffic volume correlation with the time of day or the day of the week, overall Vehicle Miles Traveled (VMT), and associated exhaust emissions. The truck routing evaluation would also identify alternative truck routes and their impacts on VMT and air quality.	This comment recommends that the City evaluate Heavy Heavy-Duty (HHD) truck routing patterns for future development projects. As previously noted, the proposed VMT Reduction Program aims to establish mitigation for future projects that exceed the City’s VMT thresholds in the form of a mitigation bank. The program would identify, quantify, and prioritize applicable mitigation measures, and relevant VMT-reducing projects within Fresno to be funded by the proposed mitigation bank. All future transportation improvements, including those implemented as part of future development projects, would be required to undergo environmental review under CEQA. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.

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B1-7	6) 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.	This comment provides information related to the District's incentives for public agencies, businesses, and property owners of multi-unit dwellings to install electric charging infrastructure, and recommends installation of electric vehicle charging stations at project sites. All construction activities associated with individual VMT-reducing improvement projects identified in the proposed VMT Reduction Program would be analyzed on a case-by-case basis, including improvements implemented as part of future development projects, and would be required to undergo environmental review under CEQA. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
B1-8	7) District's Bikeway Incentive Program Incorporating design elements (e.g., installing bikeways) within the Project area that enhance walkability and connectivity can result in an overall reduction of VMT and improve air quality within the area. The Bikeway Incentive Program provides funding for eligible Class I (Bicycle Path Construction), Class II (Bicycle Lane Striping), or Class III (Bicycle Route) projects. These incentives are designed to support the construction of new bikeway projects to promote clean air through the development of a widespread, interconnected network of bike paths, lanes, or routes and improving the general safety conditions for commuter bicyclists. Only municipalities, government agencies, or public educational institutions are eligible to apply. More information on the grant program can be found at: https://ww2.valleyair.org/grants/bike-paths/ Guidelines and Project Eligibility for the grant program can be found at: https://ww2.valleyair.org/media/drpijuw1/bikeway-program-guidelines-62515.pdf	This comment provides information related to the District's Bikeway Incentive Program. As noted in the Draft EIR, the proposed VMT Reduction Program identifies multi-modal transportation improvements including bikeway and bikeway network improvements. This comment regarding the District's grant program is noted, but this comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.

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B1-9	8) Future Projects / Land Use Agency Referral Documents The DEIR states that all future individual VMT reducing improvement projects within Fresno, including those implemented as part of development projects, would require separate environmental review under CEQA. The District recommends future project 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	This comment acknowledges that future projects implemented under the proposed VMT Reduction Program would undergo separate environmental review under CEQA, and recommends that future projects be provided to the District for review. This comment is noted, but this comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
Organizations and Interested Parties		
C1	Pacific Gas and Electric Company (July 7, 2025)	
C1-1	Thank you for submitting the VMT Reduction project plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities. Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights. Below is additional information for your review: 1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en/account/service-requests/building-and-renovation.html. 2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to	This comment provides an introduction to the comment letter and states that the Pacific Gas and Electric Company (PG&E) will review future projects to determine potential impacts to PG&E facilities. In addition, this comment includes information regarding requirements related to natural gas facilities and electric facilities. Because all construction activities associated with individual VMT-reducing improvement projects identified in the proposed VMT Reduction Program would be analyzed on a case-by-case basis, including improvements implemented as part of future development projects, and would be required to undergo environmental review under CEQA, the recommendations included in this comment do not pertain to the proposed VMT Reduction Program. As such, this comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.

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	be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services. 3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities. Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851 filing is required. This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.	
C2	Building Industry Association of Fresno/Madera Counties, Inc. (August 15, 2025)	
C2-1	The Building Industry Association of Fresno and Madera Counties (BIA) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the City of Fresno's Vehicle Miles Traveled (VMT) Reduction Program (SCH No. 2024091129). The BIA represents homebuilders, developers, and associated industries committed to providing quality housing and fostering sustainable growth in the Fresno region. After reviewing the DEIR, we offer the following comments:	This comment provides an introduction to the comment letter and briefly summarizes the commenter's organization. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
C2-2	1. Strong Nexus for Proposed Fees: We support the City's efforts to reduce VMT and improve transportation infrastructure. However, it is critical that any mitigation fees imposed on new development demonstrate a clear and direct nexus between the fee and the impacts of the development, as required by Government Code Sections 66000 - 66025. The nexus study must thoroughly and transparently demonstrate the proportional relationship between new development, increased VMT, and the costs of the proposed mitigation measures. This is especially relevant in light of the significant unavoidable transportation impacts described in the DEIR.	This comment discusses the mitigation fee identified in the proposed VMT Reduction Program, and expresses an opinion regarding the mitigation fee's nexus with projects identified in the proposed VMT Reduction Program. This comment does not address the adequacy or completeness of the Draft EIR and only references the significant and unavoidable impact related to VMT. Refer to the Master Response for a discussion of comments on the Project Description and project merits. This comment does not request the incorporation of additional information relevant to environmental issues. Such

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		comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
C2-3	2. Support for Market-Rate Housing: We urge the City to prioritize VMT-reducing projects that support the development of additional market-rate housing in Fresno. A diverse housing stock, including market-rate options, is essential to meeting the region's housing needs and promoting economic growth. Projects that facilitate infill development, mixed-use communities, and transit-oriented development should be prioritized as a means of reducing VMT and providing housing choices. This aligns with the General Plan policies regarding infill and mixed-use development.	This comment requests that the City prioritize VMT-reducing projects that support the development of market-rate housing in Fresno. Refer to the Master Response for a discussion of comments on the Project Description and project merits. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
C2-4	3. Fair and Equitable Fee Structure: The VMT reduction program should be applied in a fair and consistent manner. Fees should be determined based on a comprehensive analysis of the projected VMT impact, taking into account factors such as project location, density, and access to alternative transportation options.	This comment provides an opinion regarding implementation of the proposed VMT Reduction Program. Refer to the Master Response for a discussion of comments on the Project Description and project merits. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.
C2-5	4. Urban Design Calculator: The DEIR mentions the Urban Design Calculator (UDC) as a tool for estimating VMT reductions. Ensure that the UDC is regularly reviewed and updated to incorporate the latest data and best practices, reflecting current conditions in Fresno.	This comment provides an opinion on implementation of the proposed VMT Reduction Program and the Urban Design Calculator. Refer to the Master Response for a discussion of comments on the Project Description and project merits. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.

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C2-6	5. Alternatives Considered: We acknowledge the analysis of alternatives, including the "No Project Alternative" and the "All Applicable Fee Alternative" referenced. We believe further exploration of alternatives that offer a balance between VMT reduction and housing affordability is warranted.	This comment requests that an alternative that discusses the balance of VMT reduction and housing affordability be completed. The project alternatives analyzed in the Draft EIR were developed by changing components of the proposed project to reduce potential impacts that could result from implementation of the proposed VMT Reduction Program. The proposed program would establish a VMT mitigation mechanism for future development projects that exceed the City's VMT thresholds in the form of a mitigation fee. The proposed program would fund VMT-reducing transportation improvements within the City, but it does not propose any specific land use changes or development. It is assumed that the comment is requesting an alternative that contemplates a reduced VMT mitigation fee in order to allow for great housing affordability. As noted in the Draft EIR, a significant and unavoidable impact would occur related to VMT impacts because it is unknown when the VMT mitigation fee would be able to fund transportation improvements, and it is not known whether the transportation improvements would result in reduced VMT impacts. As such, an alternative that contemplates a reduced VMT mitigation fee would likely result in similar environmental impacts as the proposed VMT Reduction Program and would not provide a robust comparison for CEQA purposes.

4.0 DRAFT EIR TEXT REVISIONS

This chapter presents specific changes to the text of the Draft EIR that are being made to clarify any errors, omissions, or misinterpretation of materials in the Draft EIR in response to comments received during the public review period, or as directed by City staff. In no case do these revisions result in a greater number of impacts or impacts of a greater severity than those set forth in the Draft EIR. Further, the clarifications and corrections provide in the following revisions do not constitute significant new information requiring recirculation of the Draft EIR. Where revisions to the text are called for, the page number is identified, followed by the appropriate revision. Added text is indicated with double-underlined text, and deleted text is shown in ~~strikeout~~ text.

CHAPTER 1.0, EXECUTIVE SUMMARY

The following staff-initiated text revision is made to impact statement GHG-2 in the Executive Summary Matrix on page 1-17 of the Draft EIR:

GHG-2: The proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The following staff-initiated text revision is made to impact statement GHG-3 in the Executive Summary Matrix on page 1-17 of the Draft EIR:

GHG-3: The proposed project, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to greenhouse gas emissions.

The following staff-initiated text revision is made to impact statement HAZ-4 in the Executive Summary Matrix on page 1-18 of the Draft EIR:

HAZ-4: The project ~~would not~~could be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment.

CHAPTER 3.0, PROJECT DESCRIPTION

The following staff-initiated text revision is made to the Project Objectives on page 3-9 of the Draft EIR:

3.4 PROJECT OBJECTIVES

CEQA Guidelines Section 15124(b) states that an EIR project description must include “[a] statement of objectives sought by the proposed project. The statement of objectives should include the underlying purpose of the project.” The proposed project objectives are outlined below.

- Streamline the SB 743 compliance process for development projects by providing feasible mitigation options to reduce potentially significant VMT impacts.

- ~~Generate~~Identify funding for future TDM strategies and VMT-reducing projects within Fresno to help reduce Citywide total VMT.
- Contribute towards making Fresno a pedestrian-, bicycle-, and transit-oriented community with active, healthy, and livable spaces.

SECTION 4.4, BIOLOGICAL RESOURCES

The following text revision is made to Mitigation Measure BIO-1 on page 4.4-22 of the Draft EIR:

Mitigation Measure BIO-1: Transportation improvements funded by the proposed Vehicle Miles Traveled Reduction Program subject to California Environmental Quality Act (CEQA) review, and with the potential to reduce or eliminate habitat for native plant and wildlife species or sensitive habitats, shall provide a Biological Resources Assessment prepared by a qualified biologist for review and approval by the City of Fresno. The assessment shall include biological field survey(s) of the project site to characterize the extent and quality of habitat that would be impacted by development. Surveys shall be conducted by qualified biologists and/or botanists in accordance with California Department of Fish and Wildlife and/or United States Fish and Wildlife Services survey protocols for target species. Specific mitigation measures for direct or incidental impacts to special-status species shall be determined on a case-by-case basis through agency consultation during the review process for discretionary projects, and shall be consistent with survey protocols and mitigations measures recommended by the agency at the time of consultation. If no special status/sensitive species, sensitive habitats/natural communities, or federally protected wetlands are observed during the field survey, then no further mitigation will be required. If biological resources are documented on the project site, the project proponent shall comply with the applicable requirements of the regulatory agencies and shall apply mitigation determined through the agency permitting process.

The following text revision is made to Mitigation Measure BIO-4 on page 4.4-24 of the Draft EIR:

Mitigation Measure BIO-4: A pre-construction nesting bird clearance survey shall be conducted by a qualified biologist no more than fourteen (14) days prior to the start of any vegetation removal or ground disturbing activities associated with a transportation improvement project. The survey shall be conducted by a qualified biologist and cover all suitable nesting habitat within the project impact area, and areas within a biologically defensible buffer zone surrounding the project impact area. Further, if an active bird nest is found, the qualified biologist should identify the specific bird species and establish a “no-disturbance” buffer around the active nest to avoid potential direct and indirect impacts. It is further recommended that the qualified biologist periodically monitor any active bird nests to determine if project-related activities disturb the birds and if the “no disturbance” buffer should be increased. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, project activities within the “no-disturbance” buffer may occur following an additional survey by the qualified biologist to search for any new nests in the restricted area. Specific mitigation measures for direct or incidental impacts to avian species protected under Fish and Game Code 3500 and the Migratory Bird Treaty Act (MBTA) shall be determined on a case-by-case basis through agency consultation during the review process for discretionary

projects, and shall be consistent with survey protocols and mitigations measures recommended by the agency at the time of consultation.

SECTION 4.9, HAZARDS AND HAZARDOUS MATERIALS

The following text revision is made to impact statement HAZ-4 on page 4.9-19 of the Draft EIR:

HAZ-4 The proposed project would not be located on a site that is included on a list of hazardous materials sites compiled by Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment.

CHAPTER 6.0, ALTERNATIVES TO THE PROPOSED PROJECT

The following staff-initiated text revision is made to the Project Objectives beginning on page 6-3 of the Draft EIR:

6.3.2 Project Objectives

An EIR must only discuss in detail an alternative that is capable of feasibly attaining most of the basic objectives associated with the action, while at the same time avoiding or substantially lessening any of the significant effects associated with the proposed project. Below are the project objectives, as provided in Section 3.4, Project Objectives.

- Streamline the Senate Bill (SB) 743 compliance process for development projects by providing feasible mitigation options to reduce potentially significant VMT impacts.
- ~~Generate~~Identify funding for future TDM strategies and VMT-reducing projects within Fresno to help reduce Citywide total VMT.
- Contribute towards making Fresno a pedestrian-, bicycle-, and transit-oriented community with active, healthy, and livable spaces.

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