



# County of Fresno

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

## EVALUATION OF ENVIRONMENTAL IMPACTS

- APPLICANT: Wesclo, LP
- APPLICATION NOS.: Initial Study No. 7085 and Classified Conditional Use Permit Application No. 3526
- DESCRIPTION: Allow a personal/recreational vehicle storage facility and a caretaker's residence with office on two contiguous parcels totaling 38.91 acres in the AL-20 (Limited Agricultural, 20-acre minimum parcel size) Zone District.
- LOCATION: The subject property is located northwest of the intersection of E. Shepherd Avenue and Locan Avenue, approximately 2,650 feet west of N. De Wolf Avenue adjacent to the City of Clovis (APN 557-031-29 & 42) (Sup. Dist. 5).

### I. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

- A. Have a substantial adverse effect on a scenic vista; or
- B. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project site fronts on Shepherd Avenue which is not a State Scenic Highway. The site is currently vacant with no improvements and is surrounded by properties with no or little improvements. No scenic vistas or scenic resources including trees, rock outcroppings, and historic buildings were identified on or near the site to be impacted by this proposal. The project will have less than significant impact on scenic resources.

- C. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The subject proposal would allow a personal/recreational vehicle storage facility on two contiguous parcels, totaling 38.91 acres. The project site is currently undeveloped and unfarmed. Residential subdivisions in the City of Clovis are located to the south, vacant parcels to the north, and parcels with single-family homes and farm buildings/structures to the east and to the west of the site. Residential subdivisions in the City of Fresno are located approximately 3.8 miles to the west. The area has limited farming activities.

The proposed improvements consist of 319,925 square feet of enclosed storage buildings, 222,281 square feet of covered or enclosed carport spaces for recreational vehicles, and a 2,522 square-foot caretaker's residence/office.

The proposed 8.4-foot-tall storage buildings and the 17-foot-high single-family residence are compatible in height, design, and look to other similar improvements in the area. Stucco façade of the proposed storage buildings fronting on Shepherd Avenue and Locan Avenue alignment will include appealing decorative design typical of such facilities. Additionally, landscaping will be provided along these streets as well.

With low building height, decorative building façade, and the proposed landscaping, the project will have a less than significant visual impact on the surrounding area.

- D. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

The project will install outdoor security lighting, which has the potential of generating glare in the area. To minimize such impacts, a mitigation measure would require that all lighting shall be hooded and directed downward so as to not shine toward adjacent property and public streets.

\* **Mitigation Measure**

1. *All outdoor lighting shall be hooded and directed downward so as to not shine toward adjacent properties and public streets.*

## II. AGRICULTURAL AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project, and forest carbon measurement methodology in Forest Protocols adopted by the California Air Resources Board. Would the project:

- A. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use; or
- B. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project is not in conflict with agricultural zoning and is an allowed use on land designated for agriculture with discretionary approval and adherence to the applicable General Plan Policies. The project site is not classified as Prime or Unique Farmland, or Farmland of Statewide Importance. The site is classified as Farmland of Local Importance on the 2016 Fresno County Important Farmland Map and is not restricted by a Williamson Act Land Conservation Contract. Previously, a Notice of Non-Renewal was recorded for Williamson Act Land Conservation Contract No. AP-45 on June 14, 2002, which allowed the Contract to expire on December 11, 2011.

- C. Conflict with existing zoning for forest land, timberland or timberland zoned Timberland Production; or
- D. Result in the loss of forest land or conversion of forest land to non-forest use; or
- E. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use?

FINDING: NO IMPACT:

The project is not in conflict with the existing AL-20 (Limited Agricultural, 20-acre minimum parcel size) zoning on the property and is not located in an area designated for timberland or zoned for timberland production. No forests occur in the vicinity; therefore, no impacts to forests, conversion of forestland, or timberland zoning would occur because of the subject proposal.

The proposed RV sales and storage facility requires discretionary land use approval. The use was added to the AL-20 Zone District through Amendment to Text (AT) No. 370, approved by the County Board of Supervisors on September 30, 2014.

The Fresno County Agricultural Commissioner's Office reviewed the proposal and offered no comments on the project.

### III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

- A. Conflict with or obstruct implementation of the applicable Air Quality Plan?

**FINDING: LESS THAN SIGNIFICANT IMPACT:**

An Air Quality and Greenhouse Gas Analysis Report, was prepared for the project by Mitchell Air Quality Consulting, dated May 26, 2019, and was provided to the San Joaquin Valley Air Pollution Control District (SJVAPCD) for comments. No comments provided by the Air District.

Construction and operation of the project (light industrial uses) would contribute the following criteria pollutant emissions: reactive organic gases (ROG), carbon monoxide (CO), nitrogen dioxide (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>).

As discussed in Section III, B. below, emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> associated with the construction and operation of the project would not exceed the District's significance thresholds. Furthermore, as discussed in Section III, C. below, the project would not result in CO hotspot that would violate CO standards. The project is consistent with the current AQP (Air Quality Plan) and the impact would be less than significant.

The San Joaquin Valley Air Pollution Control District approved Air Impact Assessment (AIA) application for the project and determined that the mitigated baseline emissions for construction and operation will be less than two tons NO<sub>x</sub> per year and two tons PM<sub>10</sub> per year. Further, pursuant to District Rule 9510 Section 4.3, the project is exempt from the requirements of Section 6.0 (General Mitigation Requirements) and Section 7.0 (Off-site Emission Reduction Fee Calculations and Fee Schedules) of the rule. Therefore, the project complies with the emission reduction requirements of District Rule 9510 and is not subject to payment of off-site mitigation fees.

- B. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

**FINDING: LESS THAN SIGNIFICANT IMPACT:**

The primary pollutants of concern during project construction and operation are ROG, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. The San Joaquin Valley Air Pollution Control District (SJVAPCD) Guidance for Assessing, and Monitoring Air Quality Impacts (GAMAQI) adopted in 2015 contains threshold for CO, NO<sub>x</sub>, ROG, SO<sub>x</sub> PM<sub>10</sub> and PM<sub>2.5</sub>. The SJVAPCD's annual emission significance thresholds used for the project, define the substantial contribution for both operational and construction emissions are 10 tons per year ROG, 10 tons per year NO<sub>x</sub>, 100 tons per year CO, 27 tons per year SO<sub>x</sub>, 15 tons per year PM<sub>10</sub>, and 15 tons per year PM<sub>2.5</sub>. The project does not contain sources that would produce substantial quantities of SO<sub>2</sub> emissions during construction and operation.

Per the Air Quality and Greenhouse Gas Analysis Report, year 2022 through 2025 the construction air pollutant emissions (ton per year) associated with the project would be

0.46 for ROG, 3.92 for NO<sub>x</sub>, 2.71 for CO, 1.11 for PM<sub>10</sub>, and 0.32 for PM<sub>2.5</sub>, which are less than the threshold of significance. Likewise, the operational air pollutant emission over the life of the project, primarily from energy use and mobile sources, would be 2.85 for ROG, 0.54 for NO<sub>x</sub>, 1.87 for CO, 0.71 for PM<sub>10</sub>, and 0.19 for PM<sub>2.5</sub>, which are less than the threshold of significance.

Per the SJVAPCD Air Quality Attainment Plans, nonattainment pollutant emissions will continue to decline each year as regulations adopted to reduce these emissions are implemented, accounting for growth projected for the region. Therefore, the cumulative health impact will also decline even with the project's emission contribution.

As discussed above, the regional analysis of the construction and operational emissions indicates that the project would not exceed the District's significance thresholds and is consistent with the applicable Air Quality Attainment Plan. Therefore, the project would not result in significant cumulative health impacts.

C. Expose sensitive receptors to substantial pollutant concentrations?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Sensitive receptors as defined by San Joaquin Valley Air Pollution Control District are hospitals, residences, convalescent facilities, and schools. The closest sensitive receptor, a house, is located approximately 100 feet south of the project site.

Per the Air Quality and Greenhouse Gas Analysis Report, an analysis of maximum daily emissions during construction and operation of the project was conducted to determine if emissions would exceed 100 pounds per day for any pollutant of concern which include NO<sub>x</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub>. The maximum daily air pollutant emissions (pound per day) during construction would be 3.30 for ROG, 25.56 for NO<sub>x</sub>, 24.87 for CO, 7.80 for PM<sub>10</sub>, and 2.17 for PM<sub>2.5</sub>, and would not exceed SJVAPCD screening thresholds for any pollutant.

Operational emissions are generated on-site by area sources such as consumer products, landscape maintenance, energy use, and onsite motor vehicle operation at the project site. Most motor vehicle emissions would occur distant from the site and would not contribute to a violation of ambient air quality standards, making the analysis highly conservative. The maximum daily air pollutant emissions (pound per day) during operations (2023) would be 15.87 for ROG, 3.05 for NO<sub>x</sub>, 11.56 for CO, 3.99 for PM<sub>10</sub> and 1.09 for PM<sub>2.5</sub> and would not exceed SJVAPCD screening thresholds for any pollutant.

Localized high levels of CO are associated with traffic congestion and idling or slow-moving vehicles. Construction of the project would result in minor increases in traffic for the surrounding road network during the duration of construction. The project is in a location with low traffic volumes. No congested conditions that would result in a CO hotspot are possible. In addition, the highest background 8-hour average of carbon monoxide during the latest year CO was monitored is 2.06 ppm, which is 78 percent

lower than the state ambient air quality standard of 9.0 ppm. Therefore, the project would not significantly contribute to an exceedance of state or federal CO standards.

The project construction would involve the use of diesel fueled vehicles and equipment that emit DPM (diesel particulate matter) which is considered a Toxic Air Contaminants (TAC). The SJVAPCD's latest threshold of significance for TAC emissions are an increase in cancer risk for the maximally exposed individual of 20 in a million. The SJVAPCD's 2015 GAMAQI does not currently recommend analysis of TAC emissions from project construction activities, but instead focuses on projects with operational emissions that would expose sensitive receptors over a typical lifetime of 70 years. In addition, the project's storage units are prefabricated and require the limited use of diesel construction equipment.

The project is not a use that will generate substantial toxic air contaminant emissions. Traffic generation from the mini storage facility is minimal and the volume of truck traffic is low. The project includes an on-site manager's residence. The traffic volume on E. Shepherd Avenue at N. Fowler Avenue was 6,201 trips per day and no traffic volumes were available for N. Locan Avenue near the project site. The project would not exceed California Air Resources Board (ARB) recommendation of avoiding new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day. The project also complies with ARB distance recommending from fueling stations, dry cleaning operations and auto body shops.

Valley fever (coccidioidomycosis), is an infection caused by inhalation of the spores of the fungus, *Coccidioides immitis* (*C. immitis*) which lives in soil. The project site is situated on previously disturbed farmland that does not provide suitable habitat for the spores. Construction activities, however, could generate fugitive dust that contain *C. immitis* spores. The project will minimize the generation of fugitive dust during construction activities by complying with the District's Regulation VIII. Therefore, this regulation, combined with the relatively low probability of the presence of *C. immitis* spores, would reduce Valley fever impacts to less than significant. During operations, dust emissions are anticipated to be relatively small, because most of the project area would be occupied by buildings, gravel surfaces, and concrete pavement. This condition would lessen the possibility that the project would provide suitable habitat for *C. immitis* spores and generate fugitive dust that may contribute to Valley fever exposure. Impacts would be less than significant.

Per the U.S. Geological Survey 2011, the project area is outside of an area of naturally occurring asbestos in California. Therefore, development of the project is not anticipated to expose receptors to naturally occurring asbestos. Impacts would be less than significant.

In summary, localized impacts from criteria pollutant emissions would not exceed SJVAPCD screening thresholds. The project does not include substantial amounts of diesel equipment and truck trips that would result in a significant increase in cancer risk, chronic risk, and acute risk due to TAC emissions. Impacts from Valley fever exposure and naturally occurring Asbestos would be less than significant.

- D. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Odor impacts on residential areas and other sensitive receptors, such as hospitals, day-care centers, and schools. The project is located near residences but is situated in an agricultural/rural residential area where similar odors are common.

The SJVAPCD defines common odor producing land uses as landfill sites, transfer stations, sewage treatment plants, wastewater pump stations, composting facilities, feed lots, coffee roasters, asphalt batch plants, and rendering plants. The project would not engage in any of these activities.

The project includes an on-site caretaker's residence which is considered a sensitive receptor. As there are no major odor-generating sources, as listed above, are within screening distance of the site, there will be no substantial odor impacts on the residence. During construction, the various diesel-powered vehicles and equipment used onsite would create localized odors. These odors would be temporary and would not likely be noticeable for extended periods of time beyond the project's site boundaries. The potential for diesel odor impacts would, therefore, be less than significant.

#### IV. BIOLOGICAL RESOURCES

Would the project:

- A. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; or
- B. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION  
INCORPORATED:

The project site is located immediately down gradient of the Big Dry Creek Flood Control Basin north of a residential subdivision in the City of Clovis. The area historically has been residential and agricultural. The property east of the site is used for livestock grazing as are the other surrounding lands on the north and west. Historically, a single-family residence existed on the property but has been demolished in 2016. The current proposal is to utilize the site as a RV sales and storage facility.

The subject proposal was routed to the California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS) for review and comments. The CDFW review indicates that the project could have significant impact on California tiger

salamander (*Ambystoma californiense*), a California and Federal Endangered species and burrowing owl (*Athene cunicularia*), a State specie of special concerns. The agency also expressed concerns regarding impact to the adjoining and downstream reaches of Dry Creek and required that the project site be surveyed by a wildlife biologist to determine the project development impact on the special-status species at the site and to the adjoining Dry Creek. The U.S. Fish and Wildlife Service (USFWS) also reviewed the project and required avoidance and minimization measures for the federally listed as endangered San Joaquin kit fox that may be found present on the project site.

A Biological Evaluation (BE) was prepared for the project by the Argonaut ecological Consulting, Inc., dated September 20, 2017 and a copy was provided to CDFW and USFWL. The BE concluded that the project Study Area supports two primary habitat types (non-native grassland and ruderal) and does not support required habitat elements for California tiger salamander as there is no breeding habitat or aestivation habitat. The BE also concluded that the Study Area does not support any wetlands (including vernal pools, seasonal swales, drainages), or waters of the U.S., or waters of the State of California.

More recently, Biological Resource Assessment (BRA) prepared for the project by Argonaut Ecological Consulting, Inc., and dated March 8, 2021 made similar findings. The BRA concluded that the project site does not support habitat for special status species and the likelihood of species presence is low because of recurring disturbance since at least the 1950's. Further, aside from the remnant Dry Creek channel there are no wetlands or waters of the U.S. of State water within the project area (see further discussion in Section IV, C. below). A 100-foot setback from the southern edge of the remnant dewatered Dry Creek channel will protect the remnant Dry Creek channel and adjacent areas from the proposed development.

Regarding biological resources, the BRA concluded that there is no California Tiger Salamander (CTS) aquatic breeding habitat and no ground burrowing mammals or ground burrows on or near the project site. Due to the lack of suitable habitat, CTS is likely absent from the site. Also, there is lack of breeding habitat on or near the project site for another special status specie called Western spadefoot. Furthermore, no evidence of the presence of other special status species such as Swainson's hawk, Fresno kangaroo rat, San Joaquin kit fox, Northern California legless lizard, California glossy snake or Coast horned lizard were found within the project area.

The BRA further concluded that despite the absence of any special status species within the project site, there is a remote possibility that California tiger salamander or other wildlife species could come onto the site during construction and be harmed. To protect against the unlikely possibility that any wildlife could potentially come onto the Study Area from nearby properties during the construction and thus be harmed, the project will adhere to the following mitigation measures.

\* **Mitigation Measures**



1. *A Burrowing Owl (BUOW) survey shall be conducted prior to any ground-disturbing activities following the survey methodology developed by the California Burrowing Owl Consortium (CBOC 1993). In the event that burrowing owls are found, impacts to occupied burrows shall be avoided by implementation of a no-disturbance buffer zone in accordance with the Department's Staff Report on Burrowing Owl Mitigation (CDFG 2012) unless a qualified biologist approved by the department verifies through non-invasive methods that either the birds have not begun egg laying and incubation or that juveniles from the occupied burrows are foraging independently and are capable of independent survival. If burrowing owls will be evicted, passive relocation shall be adopted during the nonbreeding season and foraging habitat acquired and permanently protected to offset the loss of foraging and burrow habitat in accordance with the Department's Staff Report on Burrowing Owl Mitigation (CDFG 2012).*
2. *To minimize project-related impact on California Tiger Salamander (CTS):*
  - a. *Prior to any ground-disturbing activities, a silt fencing shall be installed to prevent wildlife from coming onto the project site during construction. The fencing shall be installed prior to the rainy season (preferably after May 15th or before October 15th) around the entire west and east boundaries of the property and the 100-foot setback line along the north side. The bottom of silt fencing shall be buried at least three (3) inches deep and be maintained during project grading and ground disturbing activity.*
  - b. *A qualified wildlife biologist shall conduct a visual survey of the project site immediately prior to the beginning of ground-disturbing activities to ensure no ground burrowing mammals are present and to verify the installation of silt fencing.*
  - c. *The portion of the project site north of the 100-foot setback line from the remnant Dry Creek channel shall be designated as an Environmentally Sensitive Area on the construction plans and specification, and the setback line shall be fenced with orange construction fencing to provide a visual demarcation.*
  - d. *A qualified wildlife biologist shall serve as a biological monitor during initial grading and ground-disturbing activities to visually monitor for the presence of California Tiger Salamander (CTS). If any CTS are observed, ground disturbing activities shall immediately be halted, and the California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS) shall immediately be consulted about the appropriate next step.*
3. *To evaluate Project-related impacts on nesting birds, a qualified wildlife biologist shall conduct pre-activity surveys for active nests no more than 10 days prior to the start of ground disturbance during the breeding season of February 1 through August 31. If active nests are found, prior to initiation of construction activities, a qualified wildlife biologist conduct a survey to establish a behavioral baseline of all identified nests and upon start of construction continuously monitor nests to*

*detect behavioral changes resulting from the project. If behavioral changes occur, the work causing that change shall be cease and CDFW be consulted for additional avoidance and minimization measures. If continuous monitoring of identified nests by a qualified biologist is not feasible, a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors shall be established and shall remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. Any variance from these buffers shall be notified to CDFW in advance of implementing a variance.*

4. *To minimize the likelihood of mortality, harassment or harm to kit fox that may be present on site during construction, the avoidance and minimization measures found in 2011 Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance, found at [https://www.fws.gov/sacramento/es/survey-protocols-guidelines/Documents/kitfox\\_standard\\_rec\\_2011.pdf](https://www.fws.gov/sacramento/es/survey-protocols-guidelines/Documents/kitfox_standard_rec_2011.pdf) shall be implemented. Any take that could occur as a result of the project would require consultation with the U.S. Fish and Wildlife Service under Section 7 or Section 10 of the Endangered Species Act of 1973.*

- C. Have a substantial adverse effect on state or federally-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

FINDING: NO IMPACT:

A Wetland Delineation Summary Report was prepared for the project by Agronaut Ecological Consulting, Inc., and dated February 28, 2017. Nine (9) data points were sampled on site to determine the presence of wetland or Waters of the United States. However, none of them met all three criteria (hydric soils, predominance of wetland vegetation, and evidence of wetland hydrology) for wetland or Waters of the United States. The report concluded that jurisdictional wetlands/waters are non-existent on the site.

Furthermore, according to the Biological Resource Assessment (BRA) prepared for the project by Agronaut Ecological Consulting, Inc., and dated March 8, 2021, the entire project site was walked on November 10, 2020, and January 27, 2021 to look for any evidence of current or former wetlands within the site. Soil test pits were dug to look for evidence of hydric soils, and none was found. The soils within the Dry Creek channel are coarse sands over loam. Aside from the remnant Dry Creek channel, there are no wetlands or other waters within the project area.

- D. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

FINDING: LESS THAN SIGNIFICANT IMPACT:

According to the Wetland Delineation Summary Report, the site is surrounded by developed or highly disturbed lands which do not constitute a “movement corridor” for native wildlife. Site development may affect home range and dispersal movements of wildlife currently using the site, but such movements do not constitute a movement corridor. The project will have a less than significant impact on regional wildlife movements.

- E. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- F. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan?

FINDING: NO IMPACT:

No sensitive plant communities were identified to exist on the project site. The project will not conflict with any biological resources related to tree preservation policy or any adopted Conservation Plans.

V. CULTURAL RESOURCES

Would the project:

- A. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5; or
- B. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or
- C. Disturb any human remains, including those interred outside of formal cemeteries?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

The project site is not within or near an area sensitive to historical, archeological or paleontological resources. A Cultural Resources Assessment (Report), prepared for the project and dated February 4, 2018 concluded that there are no archaeological or other cultural resources on the property.

Per the discussion in Section XVIII TRIBAL CULTURAL RESOURCES below, in the unlikely event that cultural resources are unearthed during construction activities on the property, the following actions shall be required to ensure that impacts to such cultural resources remain less than significant.

\* **Mitigation Measure**

1. *In the event that cultural resources are unearthed during ground-disturbing activities, all work shall be halted in the area of the find. An Archeologist shall be called to evaluate the findings and make any necessary mitigation recommendations. If human remains are unearthed during ground disturbing activities, no further disturbance is to occur until the Fresno County Sheriff-Coroner has made the necessary findings as to origin and disposition. All normal evidence procedures shall be followed by photos, reports, video, and etc. If such remains are determined to be Native American, the Sheriff-Coroner must notify the Native American Commission within 24 hours.*

## VI. ENERGY

Would the project:

- A. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project would not result in significant consumption of energy (gas, electricity, gasoline, and diesel) during construction or operation of the facility. Construction activities and corresponding fuel energy consumption would be temporary and localized. There are no unusual project characteristics that would cause the use of construction equipment to be less energy efficient compared with other similar construction sites in other parts of the State. Therefore, construction-related fuel consumption by the Project would not result in inefficient, wasteful, or unnecessary energy use compared with other construction sites in the area.

Operations and maintenance of the project would require on-site manager within caretaker's residence. Gasoline used by the manager commuting to and from the project site would be minimal and insignificant in comparison of the county's yearly consumption of gasoline. Therefore, gasoline use during Project operation would not constitute a wasteful, inefficient, or unnecessary use of energy.

- B. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

FINDING: NO IMPACT:

The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and no impact would occur.

The proposed caretaker's residence and other structures would be subject to Building Energy Efficiency Standards as required by Title 24, Part 6. Pursuant to the California Building Standards Code and the Energy Efficiency Standards, the County would review the design components of the Project's energy conservation measures when the Project's building plans are submitted. These measures could include insulation; use of energy-efficient heating, ventilation and air conditioning equipment (HVAC); solar-

reflective roofing materials; energy-efficient indoor and outdoor lighting systems, and other measures.

## VII. GEOLOGY AND SOILS

Would the project:

- A. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - 1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
  - 2. Strong seismic ground shaking?
  - 3. Seismic-related ground failure, including liquefaction?
  - 4. Landslides?

**FINDING: LESS THAN SIGNIFICANT IMPACT:**

The Alquist-Priolo Fault Activity Map shows the closest fault is approximately 62.5 miles northeast of the project site. It is not known if this is an active fault. Due to the project's distant location from this fault, the uncertainty of the fault's activity, and the existing regulations which require buildings to be constructed to withstand a certain amount of ground shaking, there will be less than significant impact.

Figure 9-5 of FCGPBR describes the Peak Ground Accelerations (PGA) values that have a 10 percent probability of being exceeded in 50 years. The project is in an area with 0-20 percent of PGA, which is the lowest impact range available on the map.

Figure 9-6 of FCGPBR shows that the project site is outside of those areas of moderate or high landslide hazard and those areas of shallow or deep subsidence.

- B. Result in substantial soil erosion or loss of topsoil?

**FINDING: LESS THAN SIGNIFICANT IMPACT:**

Site grading resulting from the construction of caretakers' residence and storage buildings on the property may result in some soil erosion or loss of topsoil. However, the loss would be less than significant with Project Notes from the Development Engineering Section of the Fresno County Department of Public Works and Planning requiring: 1) an Engineered Grading and Drainage Plan to show how additional storm water runoff generated by the proposal will be handled without adversely affecting adjacent properties; and 2) a Grading Permit for any grading proposed with this application.

- C. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

FINDING: NO IMPACT:

Per Figure 9-6 of Fresno County General Plan Background Report, the subject parcel is not in an area at risk of landslides. Also, the project development involves no underground materials movement and therefore, poses no risks related to subsidence.

- D. Be located on expansive soil as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

FINDING: NO IMPACT:

Per Figure 7-1 of Fresno County General Plan Background Report, the project site is not in an area where soils have been determined to exhibit moderately high to high expansion potential. The project development will implement all applicable requirements of the most recent California Building Standards Code and will consider any potential hazards associated with shrinking and swelling of expansive soils.

- E. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project will require installation of an individual sewage disposal system for the proposed single-family residence/office. The residence and the use of public restroom by visitors while visiting the facility will generate limited wastewater disposal. The City of Clovis community sewer system is currently unavailable to serve the property.

The Fresno County Department of Public Health, Environmental Health Division expressed no concerns with the proposal related to wastewater disposal except that the existing on-site septic system consisting of a septic tank and two seepage pits shall be properly destroyed. This requirement will be included as a Condition of Approval.

- F. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

FINDING: LESS THAN SIGNIFICANT IMPACT:

See discussion in Section V. CULTURAL RESOURCES above.

## VIII. GREENHOUSE GAS EMISSIONS

Would the project:

- A. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Human activities, including fossil fuel combustion and land use changes, release carbon dioxide (CO<sub>2</sub>) and other compounds cumulatively termed greenhouse gases. GHGs are effective at trapping radiation that would otherwise escape the atmosphere. The SJVAPCD, a CEQA Trustee Agency for this project, has developed thresholds to determine significance of a proposed project – either implement Best Performance Standards or achieve a 29% reduction from Business as Usual (BAU) (a specific numerical threshold). On December 17, 2009, SJVAPCD adopted *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA* (SJVAPCD 2009), which outlined the SJVAPCD's methodology for assessing a project's significance for GHGs under CEQA.

Project construction and operational activities would generate greenhouse gas (GHG) emissions. In the Air Quality and Greenhouse Gas Analysis Report prepared for the project by Mitchell Air Quality Consulting and dated May 26, 2019, GHG emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 (California Air Pollution Control Officers Association (CAPCOA) 2017), which is the most current version of the model approved for use by the San Joaquin Valley Air Pollution Control District (SJVAPCD).

The Air Quality and Greenhouse Gas Analysis Report indicates that the project would achieve reductions 11.1 percent beyond the ARB (Air Resource Board) 2020 21.7 percent target and 3.8 percent beyond the SJVAPCD 29 percent reduction from BAU (Business As Usual) requirements from adopted regulations and on-site design features. No new threshold has been adopted by the County or the SJVAPCD for the SB 32 2030 target. However, the project would achieve reductions of 17.6 percent beyond the 2020 target by 2030 through compliance with existing regulations. Based on this progress and the strong likelihood that the measures included in the 2017 Scoping Plan Update will be implemented, it is reasonable to conclude that the project is consistent with the 2017 Scoping Plan and will contribute a reasonable fair-share contribution to achieving the 2030 target. Fair share may very well be achieved through compliance with increasingly stringent state regulations that apply to new development, such as Title 24 and CALGreen; regulations on energy production, fuels, and motor vehicles that apply to both new and existing development; and voluntary actions to improve energy efficiency in existing development. In addition, compliance with the VMT targets adopted to comply with SB 375 and implemented through the RTP/SCS may be considered to adequately address GHG emissions from passenger cars and light-duty trucks. Therefore, the Greenhouse Gas Emission impact in terms of the extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting and whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project would be less than significant.

- B. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project will be subject to any regulations developed under AB (Assembly Bill) 32 as determined CARB (California Air Resources Board). AB 32 focuses on reducing GHGs (CO<sub>2</sub>, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) to 1990 levels by the year 2020. Pursuant to the requirements in AB 32, the ARB adopted the Climate Change Scoping Plan (Scoping Plan) in 2008, which outlines actions recommended to obtain that goal. Per the Air Quality and Greenhouse Gas Analysis Report, the project is consistent with most of the strategies contained in the Scoping Plan, while others are not applicable to the project.

#### IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- A. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or
- B. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; or
- C. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The Fresno County Department of Public Health, Environmental Health Division (Health Department) reviewed the proposal and requires the following as Project Notes: 1) Facilities proposing to use and/or store hazardous materials and/or hazardous wastes shall meet the requirements set forth in the California Health and Safety Code (HSC), Division 20, Chapter 6.95, and the California Code of Regulations (CCR), Title 22, Division 4.5; 2) Any business that handles a hazardous material or hazardous waste may require to submit a Hazardous Materials Business Plan pursuant to the HSC, Division 20, Chapter 6.95; 3) All hazardous waste shall be handled in accordance with requirements set forth in the California Code of Regulations (CCR), Title 22, Division 4.5; and 4) If any underground storage tank(s) are found during construction, an Underground Storage Tank Removal Permit shall be obtained from the Health Department.

The project site is not located within one quarter-mile of a school. The nearest school, Dry Creek Elementary, is approximately one mile southwest of the project site.



- D. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

FINDING: NO IMPACT:

According to the search results of the U.S. EPA's NEPAAssist Tool, the project site is not listed as a hazardous materials site. The project will not create hazards to the public or the environment.

- E. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?

FINDING: NO IMPACT:

Per the Fresno County *Airport Land Use Compatibility Plan Update* adopted by the Airport Land Use Commission (ALUC) on December 3, 2018, the nearest public airport, Fresno-Yosemite International Airport is approximately 6.7 miles southwest of the site. Given the distance, the airport will not be a safety hazard, or a cause of excessive noise for people residing/working on the site.

- F. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

FINDING: NO IMPACT:

The project site is in an area where existing emergency response times for fire protection, emergency medical services, and sheriff protection meet adopted standards. The future development proposals do not include any characteristics (e.g., permanent road closures) that would physically impair or otherwise interfere with emergency response or evacuation in the project vicinity. No impacts would occur.

- G. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

FINDING: NO IMPACT:

Per Figure 9-9 of the Fresno County General Plan Background Report, the project site is outside of the State Responsibility area for wildland fire protection. No persons or structures will be exposed to wildland fire hazards.

## X. HYDROLOGY AND WATER QUALITY

Would the project:

- A. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

FINDING: LESS THAN SIGNIFICANT IMPACT:

See discussion in Section VII., E. Geology and Soils regarding waste discharge requirements.

According to the Fresno County Department of Public Health, Environmental Health Division, as a measure to protect groundwater, all water wells (not intended for use by the project, or for future use) and septic systems that have been abandoned within the project area, shall be properly destroyed by an appropriately licensed contractor. Additionally, water wells located in the unincorporated area of Fresno County shall require permits for destruction and construction prior to commencement of work. These requirements will be included as Conditions of Approval.

- B. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

FINDING: LESS THAN SIGNIFICANT IMPACT:

According to the Applicant's Operational Statement, the project will use approximately 400 gallons of water per day provided by an on-site well.

The project site is outside of the City of Clovis Sphere of Influence but part of Clovis future planned Northeast Growth Area. The City's current water master plan and sewer master plan identifies no water source or sewer source for this future growth area; therefore, site connectivity to the City of Clovis water system or sewer system currently or in the foreseeable future is not possible.

The State Water Resources Control Board reviewed the project and stated that based on the total number of people to be served, the proposed facility is not classified as a non-transient non-community water system and therefore is not required to connect with the City of Clovis community water system. Per the Local Area Formation Commission (LAFCo), an extension of sewer and water services outside of the City's SOI would require LAFCo's approval.

The subject property is in a low water area of Fresno County. The Water and Natural Resources Division of the Fresno County Department of Public Works and Planning reviewed the proposal and due to low water usage (400 gallons per day) expressed no concerns with the project.

- C. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- 1. Result in substantial erosion or siltation on or off site?

2. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?
3. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?
4. Impede or redirect flood flows?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION  
INCORPORATED:

Big Dry Creek Reservoir and dam are located north of the project site. According to the Fresno Metropolitan Flood Control District (FMFCD), function of the earthen dam includes a seepage component at the downstream face, and for that reason, it is unsuitable to designate development in this area.

The FMFCD review of the proposal requires that a minimum 500-foot-wide area adjacent to the dam face should remain clear of development and designated as an open space. This requirement will be included as a Mitigation Measure.

\* **Mitigation Measure:**

1. *To address possible impacts related to the seepage component of the downstream face of the Big Dry Creek Reservoir and dam located northeast of the project site, a minimum of 500-foot wide area adjacent to the dam face shall remain clear of development and designated as open space per the requirements of the Fresno Metropolitan Flood Control District (FMFCD).*

The following comments from FMFCD will be included as Project Notes: 1) a temporary on-site storm water storage facility shall be provided for the development and be located and constructed so that once permanent FMFCD facilities become available, drainage can be directed to the street; and 2) drainage and grading plans shall be reviewed by the District prior to the project approval by the County.

- D. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

FINDING: NO IMPACT:

According to FEMA FIRM Panel 1585H, the project site is not subject to flooding from the One percent (1%) chance storm.

- E. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

FINDING: NO IMPACT:

Reviewing agencies and departments did not express concern with the application to indicate that the project will conflict with or obstruct implementation of a water quality control plan or sustainable management plan.

## XI. LAND USE AND PLANNING

Would the project:

- A. Physically divide an established community?

FINDING: NO IMPACT:

The project will not physically divide an established community. The City of Clovis is approximately 92 feet south of the project site.

- B. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The subject proposal entails development of a personal/recreational vehicle storage facility on a 38.91-acre property zoned AL-20 (Limited Agricultural, 20-acre minimum parcel size) in the County Zoning Ordinance and designated Agriculture in the County General Plan. According to the City of Clovis, the project area is within a General Plan Mixed Area, which requires a master plan with the first project and the property development to be in accordance with the Clovis General Plan. In a letter dated August 16, 2017, County informed the City that the project site is within County area, designated Agriculture in the County General Plan and is outside of the City's SOI. As such, there is no nexus in requiring the project development to be in accordance with the City's development standards and connect to City's water, wastewater, or recycled water system.

The County General Plan allows a personal/recreational vehicle storage facility in an agriculturally zoned area by discretionary land use approval provided it meet applicable General Plan policies.

Regarding Policy LU-A.3 a. b. c. d. g., the proposed project is near City of Clovis residential development and will adequately serve the surrounding residential development, is not located on a prime farmland, will use limited groundwater (400 gallons per day), for the office/residential, and can be served by adequate workforce from the City of Clovis.

Regarding Policy LU-A.12 and Policy LU-A.13, the project is a compatible use pursuant to Policy LU-A.3 and the project site will be separated from adjacent uses via perimeter building wall and the proposed landscaping.

Regarding Policy PF-C.17 and Policy PF-D.6, the project will utilize an on-site water well and individual sewage disposal system. The City of Clovis water and sewer services are currently unavailable to serve the property.

## XII. MINERAL RESOURCES

Would the project:

- A. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; or
- B. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local General Plan, Specific Plan or other land use plan?

FINDING: NO IMPACT:

Per Figure 7-8 of the Fresno County General Plan Background Report, the project site is not within a mineral-producing area of the County.

## XIII. NOISE

Would the project result in:

- A. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; or
- B. Generation of excessive ground-borne vibration or ground-borne noise levels?

FINDING: NO IMPACT:

The Fresno County Department of Public Health, Environmental Health Division reviewed the proposal and expressed no concerns related to noise. No impact would occur.

- C. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

FINDING: NO IMPACT:

See discussion in Section IX. E above, the project will not be impacted by airport noise.

## XIV. POPULATION AND HOUSING

Would the project:

- A. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or

- B. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

FINDING: NO IMPACT:

The project will not result in an increase of housing, nor will it otherwise induce population growth. The caretaker's residence/office will be limited to business operations.

## XV. PUBLIC SERVICES

Would the project:

- A. Result in substantial adverse physical impacts associated with the provision of new or physically-altered governmental facilities, or the need for new or physically-altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

- 1. Fire protection?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Fresno County Fire Protection District's (CalFire) review of the project did not identify any concerns with the proposal. The project will comply with the California Code of Regulations Title 24 – Fire Code and California Code of Regulations Title 19; 2) obtain CalFire conditions of approval; and 3) annex to Community Facilities District No. 2010-01 of the Fresno County Fire Protection District.

- 2. Police protection; or
- 3. Schools; or
- 4. Parks; or
- 5. Other public facilities?

FINDING: NO IMPACT:

The project will not result in the need for additional public facilities and will not affect existing public services.

## XVI. RECREATION

Would the project:

- A. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- B. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

FINDING: NO IMPACT:

The project will have no impact on neighborhood and regional parks or other recreational facilities in the area.

## XVII. TRANSPORTATION

Would the project:

- A. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; or

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

The Design Division of the Fresno County Department of Public Works and Planning reviewed the subject proposal and required a traffic impact study to determine the project's impacts to County Roads and Intersections. A Traffic Impact Study (TIS) was prepared by Peters Engineering Group, and dated November 28, 2016. According to the TIS, the intersection of Shepherd and Locan Avenues is currently operating at acceptable levels of service during the a.m. and p.m. peak hours with acceptable queuing conditions and the project is not expected to cause a significant impact at the intersection of Shepherd and Locan Avenues in the existing-plus-Project and near-term conditions. Also, queuing issues at the site entrance is not expected to result from the project. However, by the year 2037, with or without the Project, the intersection of Shepherd and Locan Avenues will operate at Level of Service (LOS) F. In order to mitigate the cumulative significant impact, the intersection would require signalization. To mitigate its share of the impact, the project would be responsible to contribute a fair share percentage of the cost of the mitigation.

The City of Clovis also reviewed the TIS and concurred with the pro-rata share cost calculated by the County as a lead agency on the project. Additionally, the City indicated that pursuant to the City's policy regarding the timing of installation of traffic signals in the urban intersections, the project proponent shall install a traffic signal at the intersection of Shepherd and Locan Avenues at this time, and provide necessary right-of-way to install all signal components in their ultimate location.

The subject property is in the County outside of the City of Clovis Sphere of Influence. The County has determined that a nexus cannot be established between the use and the anticipated traffic volume, therefore a traffic signal is not required now to accommodate the proposal. However, per the TIS recommendation and consensus

between the County and City, the project pay will pay its equitable share percentage for a future signalization of the intersection of Shepherd and Locan Avenues. Based on a p.m. peak hour project trip estimate of 44 vehicles, the equitable share is 2.3% of the signal cost, and the project contribution was calculated to be \$11,336.00. This requirement reflects in the following mitigation measure.

\* **Mitigation Measure**

1. *Prior to the issuance of building permits for the proposed project the applicant shall enter into an agreement with the City of Clovis agreeing to participate on pro-rata shares developed in the funding of future off-site traffic improvement as defined in the item below.*
  - a. *Applicant shall pay his proportionate share of costs for a future traffic signal at Shepherd and Locan Avenues. Applicant's proportionate share is \$11,336.*

Furthermore, as required by the Site Plan Review Unit of the Fresno County Department of Public Works and Planning and Road Maintenance and Operations Division (RMO) of the Development Services and Capital Projects Division, the project shall comply with the following requirements included as Conditions of Approval.

- Applicant shall grant an additional 23 feet of road right-of-way along Shepherd Avenue and construct street improvements to the County of Fresno Standards. The cross-section shall provide 35 feet from median island curb to new curb and gutter. Said road improvements may be deferred through Agreement with the County of Fresno until such time that road widening takes place on adjacent properties.
- Master planned storm drainage facilities shall be installed in Shepherd Avenue and along the prolongation of Locan Avenue north of Shepherd in accordance with the master plan on file with FMFCD. Applicant shall pay appropriate drainage fees to FMFCD in accordance with their master schedule of fees. If storm drainage facilities are also deferred by Agreement, then the applicant shall provide for the storage of additional drainage waters resulting from the development on site.
- Applicant shall provide for the undergrounding of any new utilities along Shepherd Avenue for service to the site. Additionally, any existing facilities that are impacted by the construction of road improvements shall be relocated or placed underground.
- Driveway improvements installed along Locan Avenue alignment for access to the site shall provide for two-way traffic. Paving shall be a minimum of 24-foot wide. Provisions for turnaround capabilities shall be provided at the northerly end of the drive approach. The drive approach may have to be a shared facility with the neighbor to the east. Only one connection shall be allowed for these two drives onto Shepherd Avenue if they are contiguous.
- Prior to construction of a traffic signal at Shepherd and Locan, and as a temporary intersection safety measure, the applicant shall construct a concrete worm median at the driveway connection to Shepherd Avenue that will only allow right turns out of the site onto Shepherd Avenue. At such time that the traffic signal is constructed at



the Shepherd and Locan intersection, then the concrete worm on the drive approach may be removed.

- When street improvements are constructed along Shepherd Avenue for the driveway connection, an appropriate radial or tapered paving transition shall be constructed for right turn movements into the project driveway that are sufficient for the access limits of the largest vehicle serving the project or neighboring parcel (i.e. WB-67). Additionally, the project shall maintain the existing westbound 12-foot wide single thru-lane with edge line striping along the project frontage. A second thru-lane shall not be constructed, all new pavement shall be considered additional roadway shoulder. The westbound terminus of new Shepherd Avenue road improvements at the west end of the project frontage shall be consist of a clean edge of pavement (perpendicular with the right of way) along with a street barricade and signage for an end lane, when required by the Road department.
  - To insure proposed structures can be seen by motorists during nighttime or low-visibility conditions, the applicant shall install private lighting for private landscaping, signage and/or structural features to assist in illuminating the immediate building frontage near the driveway connection to Shepherd Avenue and at sufficient intervals within the asphalt paved sections of the private driveway alignment length. Lighting shall be designed to minimize glare with adequate shielding to avoid illuminating the adjacent roadways. Proposed lighting shall be reviewed at the time of Site Plan Review.
- B. Be in conflict or be inconsistent with the California Environmental Quality Act (CEQA) Guidelines Section 15064.3, subdivision (b)?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project is to allow a mini storage facility with spaces for storage of personal/recreational vehicles. The project will be developed in phases with a total of 419,225 square feet of rentable storage area and approximately 410 vehicle storage spaces.

The State of California Governor's Office of Planning and Research document entitled Technical Advisory on Evaluating Transportation Impacts in CEQA dated December 2018 states: "Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT." Mini storage projects are not addressed in the Technical Advisory. The mini-storage facilities are typically strategically located near areas in need of such facilities. By adding mini-storage facilities to the existing residential and urban fabric and thereby improving destination proximity, local-serving mini-storage facilities tends to shorten trips and reduce VMT (Vehicle Miles Travelled). Given that, the project would create a less-than-significant transportation impact.

- C. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

FINDING: NO IMPACT:

The project site fronts on Shepherd Avenue and will gain access from Locan Avenue alignment as a private drive easement. The project will not increase traffic hazards due to design features due to Conditions of Approvals noted in XVII., A., above.

D. Result in inadequate emergency access?

FINDING: NO IMPACT:

Access to the project site will be from Locan Avenue alignment. The project design provides for emergency fire exit located along Shepherd Avenue approximately 80 feet east of the west property line.

## XVIII. TRIBAL CULTURAL RESOURCES

Would the project:

- A. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or
  2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project site is not in an area designated as highly or moderately sensitive for archeological resources. Pursuant to Assembly Bill (AB) 52, the project was routed to the Santa Rosa Rancheria Tachi Yokut Tribe, Picayune Rancheria of the Chukchansi Indians, Dumna Wo Wah Tribal Government, and Table Mountain Rancheria offering them an opportunity to consult under Public Resources Code (PRC) Section 21080.3(b) with a 30-day window to formally respond to the County letter. Dumna Wo Wah Tribal Government requested for consultation, staff offered a meeting and provided a letter of Archaeological Records Search from the Southern San Joaquin Valley Information Center, and a letter of Sacred Lands Search from the Native American Heritage Commission, both showing negative results. The tribe provided no response to the request for a meeting and the consultation process was closed.

The Table Mountain Rancheria also requested for consultation, staff offered a meeting, and provided a Cultural Resources Assessment (Report) prepared for the project identifying no cultural resources on the property. The tribe provided no response to the request for a meeting, and the consultation process was closed.

In the unlikely event, if cultural resources are discovered on the property, the Mitigation Measure included in the CULTURAL ANALYSIS section of this report will reduce any potential impact to tribal cultural resources to a less than significant level.

## XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

- A. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

FINDING: LESS THAN SIGNIFICANT IMPACT:

See discussion in Section VII, E. GEOLOGY AND SOILS above. The project will not result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities.

- B. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

FINDING: LESS THAN SIGNIFICANT IMPACT:

See discussion in Section X, B. HYDROLOGY AND WATER QUALITY above.

- C. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

FINDING: LESS THAN SIGNIFICANT IMPACT:

See discussion in Section VII, E. GEOLOGY AND SOILS above.

- D. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or

- E. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Limited solid waste will be produced by onsite office/caretaker residence and will go into local land fill site through regular trash collection service. The impact would be less than significant.

## XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- A. Substantially impair an adopted emergency response plan or emergency evacuation plan, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; or
- B. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; or
- C. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
- D. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

FINDING: NO IMPACT:

The project site is not located within or near a State Responsibility Area for wildfire.

## XXI. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:

- A. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Impacts on biological and cultural resources have been reduced to a less than significant level with the Mitigation Measures discussed in Section IV, and Section V above.

- B. Have impacts that are individually limited, but cumulatively considerable (“cumulatively considerable” means that the incremental effects of a project are considerable when

viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

**FINDING: LESS THAN SIGNIFICANT IMPACT:**

Each of the projects located within Fresno County has been or would be analyzed for potential impacts, and appropriate project-specific Mitigation Measures are developed to reduce that project's impacts to less than significant levels. Projects are required to comply with applicable County policies and ordinances. The incremental contribution by the proposed project to overall development in the area is less than significant.

The subject proposal will adhere to the permitting requirements and rules and regulations set forth by the Fresno County Grading and Drainage Ordinance, San Joaquin Air Pollution Control District, and California Code of Regulations Fire Code at the time development occurs on the property. No cumulatively considerable impacts relating to Agricultural, and Forestry Resources, Air Quality, or Greenhouse Gas Emission were identified in the project analysis. Impacts identified for Aesthetics, Biological Resources, Cultural Resources, Hydrology & Water Quality, and Transportation will be addressed with the Mitigation Measures discussed in Section I, Section IV, Section V, Section X, and Section XVII of this report.

- C. Have environmental effects which will cause substantial adverse effects on human beings either directly or indirectly?

**FINDING: NO IMPACT:**

No cumulative impacts were identified in this analysis. No substantial adverse effects on human beings were identified.

## **CONCLUSION/SUMMARY**

Based upon Initial Study (IS) No. 7085 prepared for Classified Conditional Use Permit Application No. 3526, staff has concluded that the project will not have a significant effect on the environment. It has been determined that there will be no impacts to mineral resources, noise, population and housing, recreation, or wildfire.

Potential impacts related to agricultural and forestry resources, air quality, energy, geology and soils, greenhouse gas emissions, hazard and hazardous materials, land use and planning, public services, tribal cultural resources, and utilities and service systems have been determined to be less than significant.

Potential impacts to aesthetics, biological resources, cultural resources, hydrology and water quality, and transportation have been determined to be less than significant with the identified mitigation measures.

A Mitigated Negative Declaration is recommended and is subject to approval by the decision-making body. The Initial Study is available for review at 2220 Tulare Street, Suite A, Street Level, located on the southeast corner of Tulare and "M" Street, Fresno, California.

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