



County of Fresno

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

EVALUATION OF ENVIRONMENTAL IMPACTS

- APPLICANT: Forefront Power, LLC
- APPLICATION NOS.: Initial Study No. 8027 and Unclassified Conditional Use Permit Application No. 3705
- DESCRIPTION: Allow the construction, operation and ultimate decommissioning of a 1.75-Megawatt AC solar photovoltaic energy generation facility, located on an approximately 13-acre portion of a 19.32-acre parcel in the AE-20 (Exclusive Agricultural, 20-acre minimum parcel size) Zone District.
- LOCATION: The project site located on the south side of E. Manning Avenue approximately 450 feet from the southeast corner of the intersection of E. Manning and S. Crawford Avenue, approximately 2.25 miles east of the City of Reedley and 2.25 miles west of the City of Orange Cove (373-111-72) (22899 E. Manning Avenue) (Sup. Dist. 4).

I. AESTHETICS

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

- A. Have a substantial adverse effect on a scenic vista?

FINDING: LESS THAN SIGNIFICANT IMPACT:

No scenic vistas were identified; however, the project site is located in a rural area where surrounding properties do have views of open space, foothills and mountains to the east. Smith Mountain, elevation 1,016 feet is located approximately one mile southeast of the project site. The proposed solar arrays will be no more than eight feet in height and screened behind a slatted chain link fence. The arrays are shorter than many surrounding mature orchard trees therefore the project will have less than significant impact on views from surrounding property.

- 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 WITH MITIGATION
INCORPORATED:

No scenic resources were identified that would be impacted by the project. The project entails the removal of approximately 13 acres previously dedicated to vineyards. Based upon staff review of site photos, the vineyards do not appear to be actively cultivated. The project site is abutted on two sides by mature orchards, which will not be impacted. Manning Avenue on which the project site has frontage and proposes access, is designated as a scenic drive in the County's General Plan. As such the applicant was required to modify the project such that an adequate setback from the scenic roadway was maintained. With the addition of slatted chain-link fencing to further screen the project from the roadway, that maintenance of a 50-foot buffer distance between the solar arrays and abutting agricultural uses and considering that the solar arrays low height profile will not obstruct views from the road or surrounding property, impacts to scenic resources will be less than significant with adherence to the included Mitigation Measure.

* **Mitigation Measure(s)**

1. *The proposed solar arrays and appurtenant equipment shall be screened behind slatted chain-link fencing, provided in an earth tone color. The slatted fencing color shall be maintained in good repair, with any damaged, discolored, or missing slats being promptly replaced, for the duration of operation of the facility.*

- 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:

No publicly accessible viewing vantage points were identified. As discussed previously, impacts to view from surrounding property will be minimal. The proposed solar arrays will be located approximately 150 feet from the paved edge of the roadway along E. Manning Avenue and approximately 145 feet from the paved edge of S. Crawford Avenue. The proposed solar arrays will be less than eight feet in height and be screened from view of the public right-of-way and adjacent property behind a slatted chain link fence. Additionally, the project will be required to adhere substantially to the Pest Management Plan dated February 26, 2021 (which includes weed management), which includes provisions for control of unwanted vegetation on the site.

- 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 reflection of sunlight off solar panel surfaces would be the primary source of potential glare from the project. Solar Panels comprise cells designed to capture solar energy in order to convert it into usable energy. Therefore, solar panels are designed to absorb as much light as possible to maximize the efficiency of energy production. Additionally, Photovoltaic (PV) panels are covered with a tempered glass layer treated with an anti-reflective coating that further reduces the reflectivity of the panels. When compared to common reflective surfaces, solar panels without an anti-reflective coating produce around the same amount of reflectivity as water, which is about half the amount of reflectivity as standard glass commonly used in residential or commercial applications (Shields 2010). If an anti-reflective coating is applied to the solar panels, the reflectivity of the panels can be reduced to substantially less than that of water. A security lighting fixture is proposed at the proposed entry gate, and any other lighting, as may be required for electrical equipment in accordance with current building code.

* **Mitigation Measure(s)**

2. *Exterior lighting from dusk until dawn shall be minimized through the installation of the lowest-wattage bulb necessary for safety purposes; and all outdoor lighting shall be hooded and directed so as not to 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?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION
INCORPORATED:

According to the 2016 important farmlands map, the subject property contains approximately equal parts of Prime farmland and farmland of Statewide Importance. The project would convert approximately 13 of the property's 19 acres to non-agricultural use for the duration of the project life. Crop records provided by the applicant in their submitted Responses to Solar Guidelines, indicate that the existing vineyards have been fallow since approximately 2010, and no water has been used for agricultural purposes, however no reason is given as to why the land has remained

fallow. Although the project will remove 13 acres of farmland from production, potentially for a period of twenty (20) years, according to information provided in the applicant's reclamation plan. However, because the project will be decommissioned within twenty years, and the land returned to its pre-project condition, in accordance with the applicant's submitted reclamation plan, dated February 26, 2021; and because the project will leave approximately 30 percent of the 19-acre parcel, excepting the area dedicated to residential use, available for agricultural production. Never the less, the project will convert Prime farmland and Farmland of Statewide Importance to non-agricultural uses for the life of the project. However, once operation the facility has ceased, the land will be restored as nearly as possible to its original condition, consistent with the applicant's submitted reclamation plan, which is required for all solar projects in accordance with the County's Solar Facility Guidelines. Therefore, with adherence to the reclamation plan and the provision of financial assurance for the reclamation plan, impacts to Farmland would be less than significant.

* Mitigation Measure(s)

1. The proposed project will adhere substantially to the provisions of the Reclamation Plan for the Gonzalez Solar Project, dated February 26, 2021; and, the project proponent will provide financial assurance to the County in a manner and form acceptable to the County.

B. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The subject property is not restricted under Williamson Act contract, and the proposed use would not be in conflict with the agricultural zoning because it is an allowed use in an agriculturally zoned district provided it receives the required discretionary review and approval.

C. Conflict with existing zoning for forest land, timberland or timberland zoned Timberland Production?

D. Result in the loss of forest land or conversion of forest land to non-forest use?

FINDING: NO IMPACT:

The subject property is not zoned for forest land or timberland production.

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 forestland to non-forest use?

FINDING: LESS THAN SIGNIFICANT IMPACT:

As discussed previously, the project will result in the conversion of approximately 13-acres of farmland classified as Prime and of Statewide Importance, however, once

operation the facility has ceased, the land will be restored as nearly as possible to its original condition, consistent with the applicant's submitted reclamation plan, which is required for all solar projects in accordance with the County's Solar Facility Guidelines.

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: NO IMPACT:

According to the Air Quality and Greenhouse Gas Impact Analysis prepared for this project by EPD Solutions, Inc. date May 27, 2021, no applicable air quality plans were identified that the project would conflict with or obstruct implementation of.

- 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: NO IMPACT:

According to the Air Quality and Greenhouse Gas Impact Analysis prepared for this project by EPD Solutions, Inc. date May 27, 2021, the proposed solar facility is not expected to result in exceedance of the significance thresholds for any criteria pollutants, identified by the San Joaquin Air Pollution Control District.

- C. Expose sensitive receptors to substantial pollutant concentrations; or

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

FINDING: NO IMPACT:

Neither project construction or operation is not anticipated to generate substantial pollutant concentrations or other odor causing emissions, that would affect sensitive receptors. The project once constructed will produce renewable solar generated electricity.

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?

- 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? No comments expressing concerns related to adverse impacts to wildlife habitat, were received from either the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service.

FINDING: NO IMPACT:

No riparian habitat, or sensitive natural communities were identified on or near the project site. A search of the U.S. Fish and Wildlife Service Information for Planning and Consultation (IPaC) and the California Department of Fish and Wildlife (CDFW), California Natural Diversity Database (CNDDDB) mapping tool, identified no riparian habitat, critical habitat or sensitive natural communities, on or in the immediate vicinity of the project site.

- 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:

There are no federally protected wetlands on the subject property or in the vicinity of the subject parcel. According the U.S. Fish and Wildlife, National Wetlands Inventory (NWI) Wetlands Mapper, there are two wetland features in the vicinity of the project site; an irrigation canal running along the eastern project boundary, and another irrigation canal located approximately one-third mile to the west.

- 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 WITH MITIGATION
INCORPORATED:

A biological habitat assessment prepared for the project by Phoenix Biological Consulting, dated February 26, 2021 indicated that the subject parcel is considered suitable habitat for nesting birds including Swainson's Hawk, and that potential impacts to nesting birds be should be addressed through pre-construction surveys. The habitat assessment indicated that the subject parcel did not provide suitable habitat for any threatened or endangered avian species.

* **Mitigation Measure**

1. *Prior project related ground disturbance, surveys for Burrowing Owl, Swainson's Hawk, and nesting birds shall be conducted by a qualified wildlife biologist. The surveys shall be conducted within 30 days prior to construction if project development occurs during the spring. No ground disturbance shall occur during nesting season (between February and August) without a clearance survey conducted by the qualified biologist.*

- 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 conflicts with local policies protecting biological resources, adopted habitat conservation, natural community conservation, or any other regional, state or local habitat conservation plans were identified.

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 is not located in an area of the County identified as having a moderate or high sensitivity to cultural resources. However, to address the possibility of previously undiscovered cultural materials being unearthed by ground disturbance.

* **Mitigation Measure(s)**

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

FINDING: NO IMPACT:

The project is not anticipated to result in significant environmental impacts due to wasteful, inefficient or unnecessary consumption of energy resources during construction or operation. Project construction will be required to comply with the applicable building code related to energy efficiency, and Air Resources Board regulations pertaining to off-road compression-ignition (diesel) engines and equipment and compliance with idling engine restrictions. Project operation will generate renewable electrical energy which will be sold to the grid.

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: NO IMPACT:

The project site is not located in an area of increased risk as a result of seismic activity, according to Figure 9-5, Probabilistic Seismic Hazards (10% probability in 50 years) of the Fresno County General Plan Background Report (FCGPBR).

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

FINDING: NO IMPACT:

The project site is not located in an area p identified as being prone to soil erosion or loss of topsoil from flooding, which is generally within the river influence areas of eastern Fresno County, as per Figure 7-3 Erosion Hazards in Eastern Fresno County, of the FCGPBR. The project site is located in an area of irrigated agriculture and construction of the project is not anticipated to result in substantial soil erosion or loss of topsoil.

- 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:

The project site is not located in an area of the County identified a being at increased risk of landslide or subsidence, as per Figure 9-6 Landslide Hazards and Areas of Subsidence, of the FCGPBR. The project site is located with one of the four Major Geologic Units classified as being comprised of Quaternary alluvial materials as identified in Figure 9-1.

- 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:

The subject parcel is not located in an area of the County identified as having soils exhibiting moderate to high expansion potential, as per Figure 7-1 of the Fresno County General Plan Background Report.

- 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: NO IMPACT:

No new onsite wastewater treatment system is proposed with this project.

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

FINDING: NO IMPACT:

No paleontological resources were identified in the analysis or by any reviewing agencies or departments.

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; or
- 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:

According to the Air Quality and Greenhouse Gas Impact Analysis prepared for this project by EPD Solutions, Inc. date May 27, 2021, the project will generate Greenhouse Gas Emissions from construction activities, which were projected using the California Emissions Modeler (CalEEMod). The GHG Analysis refers to the 2008 Climate Change Action Plan (CCAP) and 2009 Final Staff Report Addressing Greenhouse Gas Emissions Impacts Under CEQA, developed by the San Joaquin Valley Air Pollution Control District (SJVAPCD). The 2009 Staff Report references the California Air Resources Board (ARB) recommendation of a GHG emissions threshold of 7,000 metric tons of CO₂ equivalent per year for operational emissions, and performance standards for construction and transportation emissions.

Construction activities were anticipated to generate approximately 183 metric tons of CO₂e (equivalent) during construction during 2022, which equates to approximately 6 metric tons of CO₂e per year distributed over a 30-year period. The project is projected to operate for a minimum period of 20 years, according the applicant's Reclamation Plan. It can be reasonably concluded that the project would generate a similar or smaller quantity of GHG emissions during reclamation of the site once the project has been decommissioned. Given this assumption, the projects GHG emissions would be well below the ARB recommended GHG emissions threshold, for both phases of the project. Additionally, because the project is a renewable energy generating facility, it is anticipated to result in a net decrease in cumulative GHG emissions when compared to non renewable electrical energy generation.

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?

FINDING: NO IMPACT:

According to the Applicant's reclamation plan dated August 6, 2021, the project does not propose to use, transport or dispose of any hazardous materials, nor create a

significant public or environmental hazard as result of releasing such hazardous materials into the environment.

- 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: NO IMPACT:

The project site is not located within a quarter mile of an existing school.

- E. 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 a search of the U.S. EPA NEPAassist mapping application, and report generated on October 13, 2021, the project site is not located on an identified hazardous materials site.

- F. 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:

The project site is not located within an airport land use plan area or within two miles of a public airport.

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

FINDING: NO IMPACT:

The project is not anticipated to interfere with any adopted emergency response plan or emergency evacuation plan.

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

FINDING: NO IMPACT:

The project site is not located in a wildland fire area.

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: NO IMPACT:

The project will not involve any waste discharge that would substantially degrade surface or groundwater.

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

FINDING: NO IMPACT:

The project proposes minimal water use, for dust control during construction and decommissioning, and periodic cleaning of the solar panels. No concerns related to water supply were expressed by any reviewing agencies or County departments. The Fresno County Water and Natural Resources Division reviewed the proposed project and evaluated the water supply, and determined that ground water supplies in the area are adequate to support the project; additionally, the project site is not located in an area of the County designated as being water short.

- 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; or
4. Impede or redirect flood flows?

FINDING: NO IMPACT:

The proposed solar arrays will not add a substantial amount of new impervious surface to the site that would result in alteration of the drainage pattern of the property or affect the course of any streams. The limited amount of new development of the site is unlikely to result in on or off-site erosion or siltation or create or contribute additional storm water runoff that would exceed the capacity of any existing or planned storm water drainage systems or contribute polluted runoff. An engineered grading and drainage plan may be required for the project unless it can be demonstrated by a licensed engineer, that the project will not substantially increase impervious surface on the site and not change the existing drainage patterns. Any additional runoff water

generated as a result of development of this project cannot be drained across property lines and must be retained on site or disposed of according to County standards.

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

FINDING: NO IMPACT:

According to FEMA, FIRM Panel 2685H, the subject parcel is not subject to flooding from the 100-year storm event, nor is in an area at risk from tsunami, or seiche which are most typically in coastal areas. The subject parcel is also, not located within an area at risk from Dam Failure Flood Inundation according to Figure 9-8 of the Fresno County General Plan Background Report.

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

FINDING: NO IMPACT:

The project proposes minimal water use. There will be water used for dust control during construction and reclamation. According to the applicant's operational statement, regular panel cleaning will utilize a commercially available biodegradable solution, in lieu of water.

XI. LAND USE AND PLANNING

Would the project:

- A. Physically divide an established community; or
- 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: NO IMPACT:

The project will not physically divide an established community. The project proposes a PV Solar facility which is not specifically prohibited in agriculturally zoned areas however, it is, as a commercial use not allowed in agricultural area without discretionary approval. The County Board of supervisors adopted the Solar Facility Guidelines in recognition of the need to accommodate new renewable energy technology with the General Plan Goals of protecting the agricultural community and preserving important farmlands. To that end, applicants for renewable energy project such as this proposed solar facility are required to abide by the provision of the Guidelines such that environmental impacts can be minimized.

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:

The project site is not located in any mineral resource locations identified by Figures 7-7 (Mineral Resource Locations) 7-8 (Principal Mineral Producing Locations [1997-1998]) or 7-9 (Generalized Mineral Resource Zone Classifications) of the Fresno County General Plan Background Report (FCGPBR).

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:

Project construction will generate a temporary increase in ambient noise levels in the vicinity, however, the project will be subject the requirements of the County Noise Ordinance which specially exempts construction activities provided that they take place during the hours and days allowable in the Ordinance. Operation of the project is not anticipated to generate any noise.

- 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; or

FINDING: NO IMPACT:

The project site is not located within the vicinity of a private airstrip or an airport land use plan, or within two miles of a public airport.

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 proposes no new housing and is not anticipated to induce any population growth. No existing housing or people will be displaced.

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

FINDING: NO IMPACT:

The project does not propose any new

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 is not located near any neighborhood or regional parks or recreational centers and does not propose any new recreational facilities or require the construction of such facilities.

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?

FINDING: NO IMPACT:

- B. Be in conflict or be inconsistent with the California Environmental Quality Act (CEQA) Guidelines Section 15064.3, subdivision (b)?

FINDING: NO IMPACT:

According to the Construction Trip Generation and VMT analysis provided by EPD Solutions, Inc., dated May 27, 2021, concluded that the project would generate approximately 22 daily trips based on ten (10) panel washers and one (1) maintenance worker, which is below the State OPR guidelines threshold assumption that small projects which generate 110 or fewer trips per day can be presumed to have a less than significant impact on cumulative Vehicle Miles Travelled.

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

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

The project has no features which would present a hazard to traffic. The proposed access driveway will be required to comply with current fire code and County development standards with regard to vehicle access. However, project construction and eventual decommissioning of the project will necessitate delivery and removal of equipment and materials to and from the site, which could potentially create some temporary hazards to vehicle traffic along Manning Avenue at the point of ingress/egress. To address this potential hazard, the project will be required to submit a Traffic Management Plan for review and approval.

* **Mitigation Measure(s)**

1. *Construction and reclamation of the proposed Solar Energy Generating facility shall comply with the Traffic Management Plan as approved by the Fresno County department of Public Works and Planning. Prior to the issuance of development permits for the project, a Traffic Management Plan*

shall be submitted to and approved by the Design Division of the Fresno County Department of Public Works and Planning.

D. Result in inadequate emergency access?

FINDING: NO IMPACT:

The project proposes a new 30-foot-wide access driveway on to Manning Avenue, which will be the only point of ingress/egress for the project. The design of the proposed access driveway will be subject to the current fire code with regard to emergency access standards.

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 with Mitigation Incorporated:

No tribal cultural resources were identified in the analysis, however, because the possibility exists that previously unknown subsurface tribal cultural resources may be unearthed during ground disturbance, the following Mitigation Measure has been included.

* **Mitigation Measure(s)**

1. *See Mitigation Measure under Section V above.*

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: NO IMPACT:

The project does not propose the installation, use or expansion of any wastewater treatment system.

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

FINDING: NO IMPACT:

Project operation will not require any water use or maintenance of the panels. A biodegradable solution will be use for this purpose in lieu of water. The only water use associated with the project will be during construction and reclamation of the site. The project was evaluated by the Water and Natural Resources Division of the Fresno County Department of Public Works and Planning, which expressed no concerns related to water supply.

- 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: NO IMPACT:

No septic system is proposed with this project.

- 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?

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project is not anticipated to generate quantifies of solid waste in excess of State or local standards, or of local solid waste infrastructure capacity, or impair attainment of solid waste reduction goals. Construction and reclamation of the project site will be subject to the applicable requirements of State law, County Ordinance with regard to solid waste disposal.

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 in or near a State Responsibility Area or on lands classified as very high fire hazard severity zones.

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 WITH MITIGATION INCORPORATED:

Potential impacts to Aesthetics, Cultural Resources, Geology and Soils, Transportation, and Tribal Cultural Resources were identified. The included mitigation measures will reduce those impacts to a less than significant level.

* **Mitigation Measure(s)**

1. *See mitigation measures under Sections I, V, XVII and XVIII 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: NO IMPACT:

No cumulatively considerable environmental impacts were identified in the analysis.

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

FINDING: NO IMPACT:

No environmental impacts were identified which would result in substantial adverse effects on people.

CONCLUSION/SUMMARY

Based upon the Initial Study prepared for Unclassified Conditional Use Permit Application No. 3705, staff has concluded that the project will not have a significant effect on the environment.

It has been determined that there would be no impacts to Air Quality, Energy, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Utilities and Service Systems, Wildfire.

Potential impacts related to Greenhouse Gas Emissions, and Utilities and Service Systems have been determined to be less than significant.

Potential impacts relating to Aesthetics, Biological Resources, Cultural Resources, Transportation, and Tribal Cultural Resources. Have determined to be less than significant with compliance with the included Mitigation Measures.

A Mitigated Negative Declaration/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 southwest corner of Tulare and "M" Street, Fresno, California.

JS

G:\4360Devs&Pln\PROJSEC\PROJDOCS\CUP\3700-3799\3705\IS CEQA\CUP 3705 IS wu.docx