California Environmental Quality Act

Initial Study

Fowler-McKinley Elementary School Project

Fresno, California

(State Clearinghouse No. 2018031026)

Lead Agency:

Clovis Unified School District

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Table of Contents

Appendices

Tables

Figures

Executive Summary

The proposed project includes the acquisition of a 22-acre school site and the construction and operation of an elementary school on the site. The site is located on the northeast corner of Fowler Avenue and the McKinley Avenue alignment in Fresno County, within the City of Fresno sphere of influence.

The elementary school would serve up to 750 students in grades TK-6. The campus would have approximately 28 classrooms, administrative offices, a multi-purpose building, hardcourt areas and athletic fields that could potentially be lighted. The school would have approximately fifty employees, including administrators, faculty, and support staff. The school would be in regular session on weekdays from late August to early June, but may host special events and classes during evenings, on weekends, and during summer recess.

The project includes annexation of the site to the City of Fresno prior to construction, and detachment from the Fresno County Fire Protection District and the Kings River Conservation District.

The timing for construction of the school would depend on enrollment growth and funding availability. The District estimates that the school could be constructed in approximately five years.

This Initial Study concluded:

1. The Initial Study identified a number of potentially significant environmental effects of the project in the following subject areas: aesthetics, air quality, biological resources, cultural resources, noise, traffic, and tribal cultural resources. The District can avoid or reduce to an insignificant level these impacts by incorporating in the project the mitigation measures listed in the table on the following pages.
2. The project would have a less than significant impact or no impact on many of the environmental resources and conditions evaluated in the Initial Study. The Initial Study explains why there would be no impacts, or the impacts would be less than significant.
3. Based on items 1 and 2, above, the District should adopt a Mitigated Negative Declaration for the project.

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TABLE 1

Mitigation Measures

Aesthetics: Mitigation for Potential Lighting Impacts

AE-1. All parking area lighting shall have full cut-off type fixtures. A full cut-off type fixture is a luminaire or lighting fixture that, by design of the housing, does not allow any light dispersion or direct glare to shine above a 90-degree horizontal plane from the base of the fixture. Full cut-off type fixtures must be installed in a horizontal position as designed.

AE-2. Athletic facilities lighting shall be designed to prevent direct glare and minimize spill over illumination on adjoining properties.

AE-3. All external signs and lighting shall be lit from the top and shine downward except where uplighting is required for safety or security purposes. The lighting shall also be, as much as physically possible, contained to the target area.

AE-4. Exterior building lighting for security or aesthetics shall be full cut-off or a shielded type design to minimize any upward distribution of light.

AE-5. Non-essential lighting shall be turned off by 10:00 pm.

Air Quality: Mitigation Measures to Reduce Localized Pollutant Concentrations

AQ-1. The following measures shall be implemented to reduce potential exposure of nearby sensitive receptors to localized concentrations of PM emissions at nearby land uses during project construction:

a. All On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:
    1) Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,
    2) Shall not operate a diesel-fueled auxiliary power system to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.
b. Off-road diesel equipment shall comply with the 5 minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use off-Road Diesel regulation. The specific requirements and exceptions in the regulations can be reviewed at the following web sites: www.arb.ca.gov/msprog/truck-idling/2485.pdf and www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf.
c. Signs shall be posted at the project site construction entrance to remind drivers and operators of the state's 5 minute idling limit.
d. To the extent available, replace fossil-fueled equipment with alternatively-fueled (e.g., natural gas) or electrically-driven equivalents.
e. The burning of vegetative material shall be prohibited.
f. The proposed project shall comply with SJVAPCD Regulation VIII for the control of fugitive dust emissions. Regulation VIII can be obtained on the SJVAPCD's website at website URL: https://www.valleyair.org/rules/1ruleslist.htm. At a minimum, the following measures shall be implemented:
    1) All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water,

chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover.

2) All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.

3) All land clearing, grubbing, scraping, excavation, land leveling, grading, cut & fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.

4) With the demolition of buildings up to six stories in height, all exterior surfaces of the building shall be wetted during demolition.

5) When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.

6) All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions.) (Use of blower devices is expressly forbidden.)

7) Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.

8) On-road vehicle speeds on unpaved surfaces of the project site shall be limited to 15 mph.

9) Sandbags or other erosion control measures shall be installed sufficient to prevent silt runoff to public roadways from sites with a slope greater than one percent.

10) Excavation and grading activities shall be suspended when winds exceed 20 mph (Regardless of wind speed, an owner/operator must comply with Regulation VIII's 20 percent opacity limitation).

g. The above measures for the control of construction-generated emissions shall be included on site grading and construction plans.

Biological Resources: Mitigation for Potential Impacts to Special Status Bat and Bird Species

BR-1: Pre-construction Surveys:

Prior to the onset of construction activity, a California Department of Fish and Wildlife (CDFW)-approved biologist will conduct pre-construction surveys for active roosting, breeding, or hibernacula sites (roosts) in large trees and buildings within the project area. Construction/building demolition will not take place as long as a roost site is occupied. Therefore, depending on when construction begins, bat surveys should be timed to be prior to the change in season (maternity vs. hibernation) so that special status bats can be correctly excluded without take (see seasons below). If no active bat roosts, breeding, or hibernacula sites are detected, no further action is required.

BR-2: Avoidance & Minimization:

a. If any active bat sites are discovered or if evidence of recent occupation is established, the following measures will be implemented in order to minimize impacts on special status bats:
   1) Construction will be scheduled to minimize impacts upon pallid bats. Type and status of active roosts shall be determined, and bat eviction shall be undertaken in a manner that does not exclude bats during times of inclement weather or exclude females from young still in a roost.
   2) Hibernation sites with evidence of prior occupation will be sealed before the hibernation season (November–March), and nursery sites will be sealed before the nursery season (April–August).

3) If the site is occupied by the bats, then construction will occur outside the hibernation season (for hibernacula), and after August 15 (for nursery colonies). Construction/building demolition will not take place as long as the roost site is occupied.
4) If exclusion devices are used, they will be employed based on current best practices and will be regularly monitored by a qualified biologist.

b. All new lighting shall be down-cast to reduce disturbance impacts to bat species.

BR-3: Avoidance:

If feasible, any vegetation removal will take place between September 1 and February 1 to avoid impacts to nesting birds in compliance with the Migratory Bird Treaty Act. If vegetation removal must occur during the nesting season, project construction may be delayed due to actively nesting birds and their required protective buffers.

BR-4: Pre-construction Surveys:

a. If vegetation removal or ground disturbance will commence between February 1 and August 31, a qualified biologist will conduct a pre-construction survey for nesting birds within 14 days of the initiation of disturbance activities. This survey will cover:
   1) Potential nest sites in trees, bushes, or grass within species-specific buffers of the project area (Swainson's hawk – 0.5-mile, other raptor species such as white-tailed kite – 500 ft, non-raptor species (loggerhead shrike, magpie etc. – 250 ft).
   2) Survey protocol developed by the Swainson's Hawk Technical Advisory Committee (TAC) should be followed (CDFG 2000), which includes survey timing and requirements for repeated visits.
b. Surveys for burrowing owl will occur within 14 days prior to any ground disturbance, no matter the season. This survey will cover potential burrowing owl burrows in the project area and suitable habitat within 150 m (500 ft). Evaluation of use by owls shall be in accordance with California Department of Fish and Wildlife survey guidelines (CBOC 1993, CDFG 1995, CDFG 2012). Surveys will document if burrowing owls are nesting or using habitat in or directly adjacent to the project area. Survey results will be valid only for the season (breeding (Feb 1-Aug 31) or non-breeding (Sept 1-Jan 31) during which the survey is conducted.
c. If no active nests or burrows are detected during the pre-construction survey, then no further action is required. If an active nest or burrow is detected, then the following minimization measures will be implemented.

BR-5: Minimization/Establish Buffers:

a. Swainson's hawk, white-tailed kite, loggerhead shrike, Lawrence's goldfinch, yellow-billed magpie, Nuttall's woodpecker, oak titmouse, and MBTA-protected species:
   If any active nests are discovered (and if construction will occur during bird breeding season), the U.S. Fish and Wildlife Service (USFWS) and/or CDFW will be contacted to determine protective measures required to avoid take. These measures could include fencing off an area where a nest occurs, or shifting construction work temporally or spatially away from the nesting birds. Biologists are required on site to monitor construction while protected migratory birds are nesting in the project area. If an active nest is found after the completion of the pre-construction surveys and after construction begins, all construction activities will stop until a qualified biologist has evaluated the nest and erected the appropriate buffer around the nest.
b. Burrowing owl:
   If burrowing owls are detected within the survey area, CDFW should be consulted to determine the suitable buffer. These buffers will consider the level of disturbance of the project activity, existing disturbance of the site (vehicle traffic, humans, pets, etc.), and time of year (nesting vs. wintering). If avoidance is not feasible, the District will work with CDFW to determine appropriate mitigation, such as passive exclusion or translocation, and associated mitigation land offset (CDFG 2012).

BR-6: If avoidance is not possible, a qualified biologist will develop appropriate mitigation that will reduce project impacts to sensitive biological resources to a less than significant level. The type and amount of mitigation will depend on the resources impacted, the extent of the impacts, and the quality of habitats to be impacted. Mitigation may include, but are not limited to: 1) Compensation for lost habitat in the form of preservation or creation of in-kind habitat protected by conservation easement; 2) Purchase of appropriate credits from an approved mitigation bank or land trust servicing the Fresno County Area; 3) Payment of in-lieu fees.

Cultural Resources: Mitigation for Potential Discovery of Subsurface Resources

CR-1: If subsurface historic or prehistoric archaeological or paleontological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified cultural resources professional or paleontologist shall be consulted to determine whether the resource requires further study. If the resources are determined to be significant, mitigation measures shall be identified by the cultural resources professional or paleontologist and recommended to the District. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds.

CR-2: If human remains are unearthed during excavation and/or construction activities, all activity shall cease immediately. No further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendent of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the District shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the District has discussed and conferred with the most likely descendants regarding their recommendations.

Noise: Mitigation for Traffic, Construction and Aircraft Noise

N-1: The following measure shall be implemented to reduce the effect of traffic noise on educational structures:

- Structures to be used for education instruction purposes shall not be located closer than 182 feet of the centerline of Fowler Avenue or 75 from the centerline of McKinley Avenue.

N-2: The following measure shall be implemented to reduce long-term operational noise impacts:

- An acoustical analysis shall be prepared for the proposed project prior to final design. The acoustical analysis shall identify noise-reduction measures to be incorporated sufficient to achieve an exterior average-hourly noise-level of 50 dBA Leq, or less, at the property line of the nearest noise-sensitive land use for on-site building mechanical equipment and vehicle parking areas. Onsite recreational uses shall be evaluated in comparison to the City of Fresno's average-daily noise standard of 60 dBA CNEL. Noise-reduction measures to be incorporated may include, but are not limited to, the selection of alternative or quieter equipment and construction of noise barriers (i.e., walls).
- Noise-generating maintenance activities, such as landscape maintenance and waste-collection activities, shall be limited to between the hours of 7:00 a.m. to 10:00 p.m.

N-3: The following measures shall be implemented to reduce construction-generated noise levels:

a. Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 10:00 p.m. Construction activities shall be prohibited on Sundays and legal holidays.

	b. Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation. c. When not in use, all equipment shall be turned off and shall not be allowed to idle. Provide clear signage that posts this requirement for workers at the entrances to the site. N-4: The following measure shall be implemented to reduce the potential effect of aircraft noise: • The architect hired to design the school buildings, with the assistance of an acoustical consultant, shall evaluate the potential for aircraft noise to adversely affect educational activities on the site and shall include acoustical treatment in the design and construction of the buildings should the proposed building design not be adequate to minimize disruption due to aircraft noise.
	Transportation/Traffic: Mitigation for Increased Traffic Generated by Project and Pedestrian and Bicycle Safety T-1: The District shall contribute its proportionate fair share for traffic improvements for those facilities or portions thereof not currently funded by the responsible agencies roadway impact fee program(s), as appropriate. The District's proportionate fair share is as indicated in Table E-17-3. T-2: The District shall participate in a pro rata basis in the provision of adequate turn lane storage capacity as indicated in Table E-17-4. T-3: The District shall install a Class II bike lane along its frontage to Fowler Avenue. T-4: The District shall conduct a warrant analysis for a hybrid beacon across Clinton Avenue at the future Laverne Avenue intersection prior to construction of the Project. T-5: As part of the Project, walkways shall be constructed along the Project's frontage to Fowler Avenue. Where possible, walkways shall be a minimum of six (6) feet wide and be separated from the street by a park strip or barrier curb to provide some separation between pedestrians and the paved portions of the road. T-6: The District shall work with the City of Fresno to implement a Safe Routes to School plan and seek grant funding to help build walkways where they are lacking within a two-mile radius of the Project site.
	Tribal Cultural Resources: Mitigation for Potential Discovery of Subsurface Resources TC-1: If subsurface tribal cultural resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified tribal cultural resources professional shall be consulted to determine whether the resources require further study. If the resources are determined to be significant, mitigation measures shall be identified by the cultural resources professional and recommended to the District. If human remains are discovered, the procedures of Mitigation Measure CR-2 shall also apply.

A. Project Background Information

1. Project Title, Lead Agency, and Lead Agency Contact Information

- Project Title: Fowler-McKinley Elementary School Project
- Lead Agency: Clovis Unified School District
- Contact: Kevin Peterson
  Assistant Superintendent, Facility Services
  Clovis Unified School District
  1450 Herndon Avenue,
  Clovis, CA 93611
  Phone: (559) 327-9260
  Email: kevinpeterson@cusd.com

2. Project Location

The site is located on the northeast corner of Fowler Avenue and the McKinley Avenue alignment in Fresno County, within the City of Fresno sphere of influence (see Figures 1, 2, and 3, and Table A-1).

TABLE A-1

Project Location

City	Unincorporated Fresno County
County	Fresno
Zip Code	93727
Assessor's Parcel Number	310-041-17, 310-041-15
Nearest Existing Major Cross Streets	Fowler Avenue and the McKinley Avenue alignment
Elevation	Approximately 337 ft. AMSL
USGS Map	Clovis Quadrangle
Section, Township & Range	Portion of Section 27, Township 13 South, Range 21 East., Mount Diablo Base and Meridian
Latitude/Longitude	36° 46' 01"N, -119° 40' 51"W

3. Project Description

The proposed project includes the acquisition of a 22-acre school site and the construction and operation of an elementary school on the site.

The elementary school would serve up to 750 students in grades TK-6. The campus would have approximately 28 classrooms, administrative offices, a multi-purpose building, hardcourt areas and athletic fields that could potentially be lighted. The school would have approximately fifty employees, including administrators, faculty, and support staff. The school would be in regular session on weekdays from late August to early June, but may host special events and classes during evenings, on weekends, and during summer recess.

The project includes annexation of the site to the City of Fresno prior to construction, and detachment from the Fresno County Fire Protection District and the Kings River Conservation District.

4. Actions Required to Implement Project

The Clovis Unified School District must undertake the following actions in order to implement the project:

- Complete the California Environmental Quality Act process for the project by adopting a mitigated negative declaration for the project;
- Adopt and implement the Mitigation Monitoring and Reporting Program identified in Section F of this Initial Study;
- Approve the project;
- Complete the California Department of Education school site approval process;
- Secure approvals, permits, and agreements, as necessary, from agencies and utilities that are responsible for public facilities and improvements needed for the project;

5. Project Schedule

The timing for construction of the school would depend on enrollment growth and funding availability. The District estimates that school could be constructed in approximately five years.

6. Project Setting

a. Existing Land Uses

The proposed project site is mostly cropland with three residential structures and a barn. Nearby existing land uses include agricultural fields both fallow and under production, rural residences, an irrigation canal, a ponding basin, and a heavy equipment storage yard. The nearest commercial use is approximately ¼ mile to the northwest. Future land uses include urban residential to the north and east.

b. Public Land Use Policy

The City of Fresno 2035 General Plan Land Use Element provides adopted land use policy within the proposed project area.

The project site planned land use designation is Public Facility/Elementary School. Surrounding land is designated as follows: land to the north and east is designated Medium Density Residential; land to the south is designated Open Space - Ponding Basin and Employment - Business Park, and land to the west is designated Employment - Light Industrial (IL).

- Medium Density residential covers developments of 5 to 12 units per acre and is intended for areas with predominantly single-family residential development, but can also accommodate a mix of housing types, including small-lot starter homes, zero-lot-line developments, duplexes, and townhouses. Much of the City's established neighborhoods fall within this designation.
- The Public Facilities designation applies to a wide range of public facilities, including City Hall, county buildings, schools, colleges, municipal airports, hospitals, fire and police stations, City-operated recycling centers, sewage treatment plants, neighborhood, community and regional parks, recreational centers, and golf courses. The Public Facilities designation also applies to multi-purpose trails that serve both regional and neighborhood needs.
- The Open Space designations (Parks and Recreational Facilities; Other Public Open Space) apply to open space areas that are not parks or trails, such as riparian corridors, the clear zone around Fresno-Yosemite International Airport, and the San Joaquin River bottom, which is primarily designated as open space even though it includes a limited number of existing homes.
- The Business Park designation provides for office/business parks in campus-like settings that are well suited for large offices or multi-tenant buildings. This designation is intended to accommodate and allow for the expansion of small businesses. Given its proximity to residential uses, only limited outdoor storage will be permitted, while adequate landscaping is imperative to minimize the visual

impacts. Typical land uses include research and development, laboratories, administrative and general offices, medical offices and clinics, professional offices, prototype manufacturing, testing, repairing, packaging, and printing. No free-standing retail is permitted, except for small uses serving businesses and employees. The maximum FAR is 1.0.

- The Light Industrial designation accommodates a diverse range of light industrial uses, including limited manufacturing and processing, research and development, fabrication, utility equipment and service yards, wholesaling, warehousing, and distribution activities. Small-scale retail and ancillary office uses are also permitted. Light Industrial areas may serve as buffers between Heavy Industrial and other land uses and otherwise are generally located in areas with good transportation access, such as along railroads and State Routes. The maximum FAR is 1.5.

c. Zoning

The Fresno County zoning for the project site and all surrounding land is AE 20 Exclusive Agriculture.

- The AE District is intended to be an exclusive district for agriculture and those uses which are necessary and an integral part of the agricultural operation. This district is intended to protect the general welfare of the agricultural community from encroachments of non-related agricultural uses which by their nature would be injurious to the physical and economic well-being of the agricultural district.
- Upon annexation of the site to the City of Fresno, the project site zoning will change to Public and Institutional (PI).

d. Streets and Highways

Fowler and Clinton Avenues are the existing streets nearest the project site. Fowler Avenue is a north-south two-lane arterial adjacent to the west side of the proposed project site. Clinton Avenue is an east-west two-lane collector in the vicinity of the project site. Future McKinley Avenue will be an east-west two-lane collector south of the project site. Future Kerry Avenue will be an east-west two-lane local street north of the project site. Based on preliminary planning for the site, access to the campus will likely be located along Fowler and future Kerry Avenue.

(Please see Section E, 17, for additional information on streets and highways.)

e. Public Utilities and Services

The project site will be annexed to the City of Fresno prior to construction. The project site is within the City of Fresno Growth Area 1 and is entitled to water under the current City of Fresno Conveyance Agreement. The location and design of the water and sewer facilities would be subject to review and approval by the City of Fresno.

The Fresno Metropolitan Flood Control District (FMFCD) is responsible for managing urban stormwater runoff within the Fresno-Clovis area. The site is within FMFCD Drainage Area “BS” and will be served by an existing pipeline that runs along Fowler Avenue. The District will enter into an agreement with FMFCD for drainage service as requested by FMFCD.

The City of Fresno will provide law enforcement and fire protection services for the project site once annexed.

The south boundary of the project site is approximately 150 feet north of the Mill No. 36 Canal in order to provide space for the Fresno Irrigation District (FID) required canal right-of way, the future McKinley Avenue, and the planned Class I bike path (JLB 2018).

(Please see Sections E, 15, and 19 for additional information on Public Utilities and Services.)

7. Request for Preliminary Comment

Clovis Unified distributed a Request for Preliminary Comment for the proposed school project to responsible, trustee and other agencies that might have an interest in the project. The Request for Preliminary Comment provided an opportunity for the agencies to comment on the potential environmental effects of the project,

including whether an Environmental Impact Report, Mitigated Negative Declaration, or Negative Declaration should be prepared for the project. Clovis Unified also sent the Request for Preliminary Comment to residents and property owners adjacent to the project site.

8. Other Public Agencies Whose Approval is Required

Implementation of the proposed school project would require approvals from the following public agencies in addition to Clovis Unified:

TABLE A-2

Responsible Agencies

Public Agency	Approval(s)
California Department of Education, School Facilities Planning Division	Review and approve proposed school for conformance with applicable state rules and regulations governing the siting and development of public schools
California Department of Toxic Substances Control	Responsible for ensuring that the proposed school sites are free of contamination or, if the properties were previously contaminated, that they have been cleaned up to a level that protects the students and staff who will occupy the new schools. Review and approve compliance with Education Code sections 17213.1 and 17213.2
Fresno Metropolitan Flood Control District	Review and approve the location, design, and construction of flood control improvements
City of Fresno	Review and approve the location, design, and construction of water, sewer and street improvements. Annex site to the City of Fresno.
Fresno County	Planning Commission: Determine if the project is consistent with the Fresno County General Plan
Fresno Local Agency Formation Commission	Approve annexation of school site to City of Fresno

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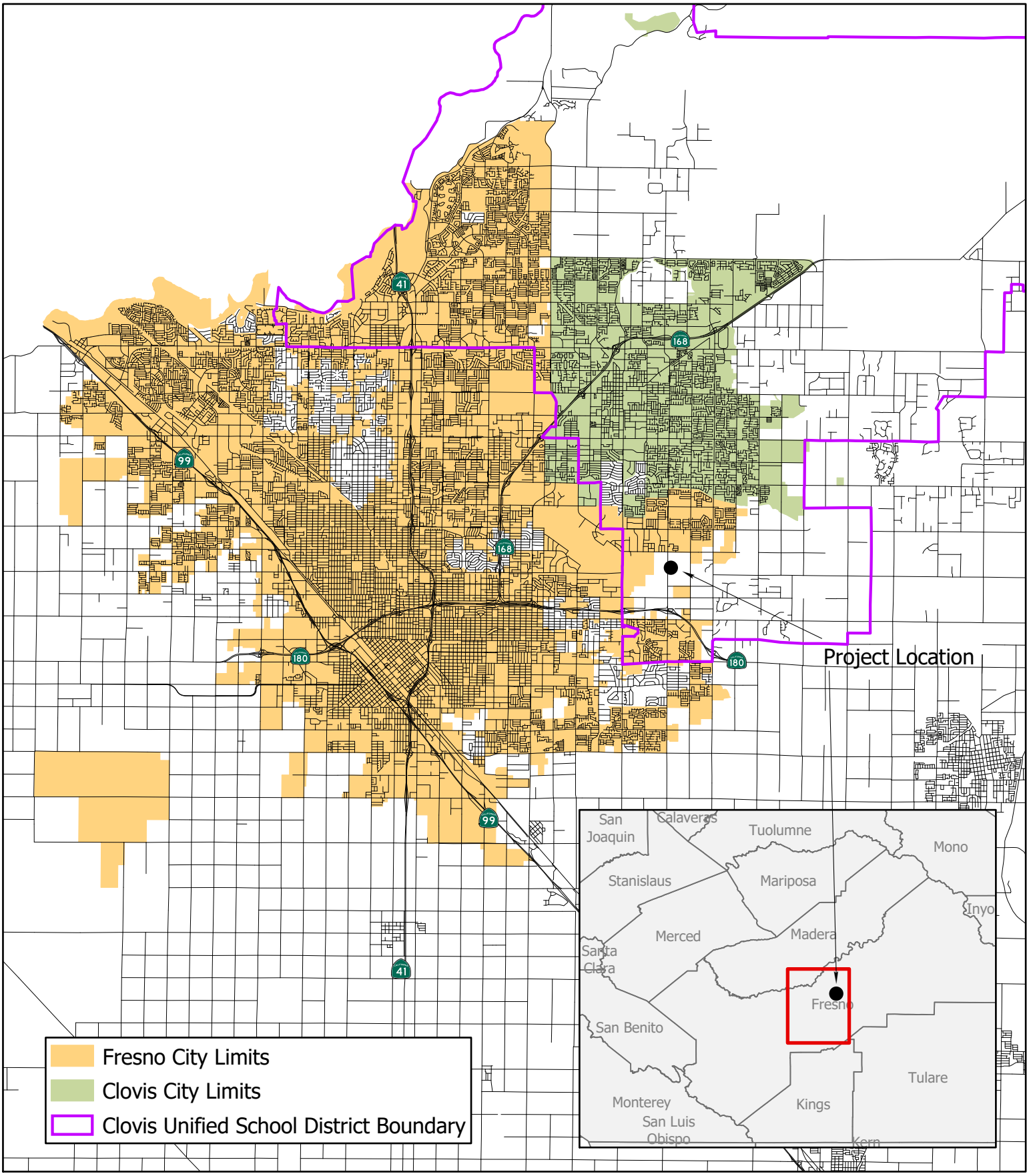

Regional Location

Figure 1

Fowler-McKinley Elementary School Project
Clovis Unified School District

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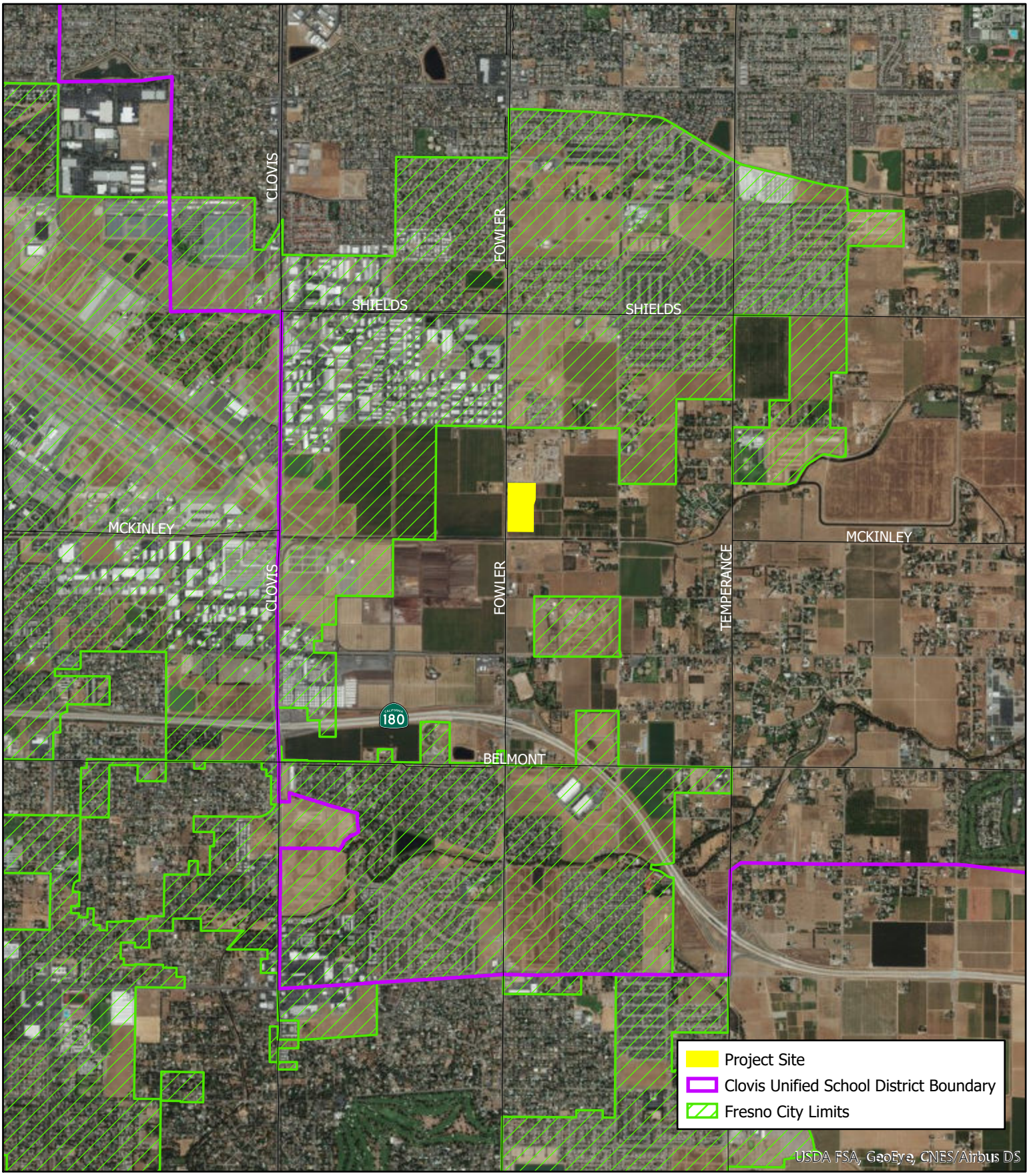

Project Location

Figure 2

Fowler-McKinley Elementary School Project
Clovis Unified School District

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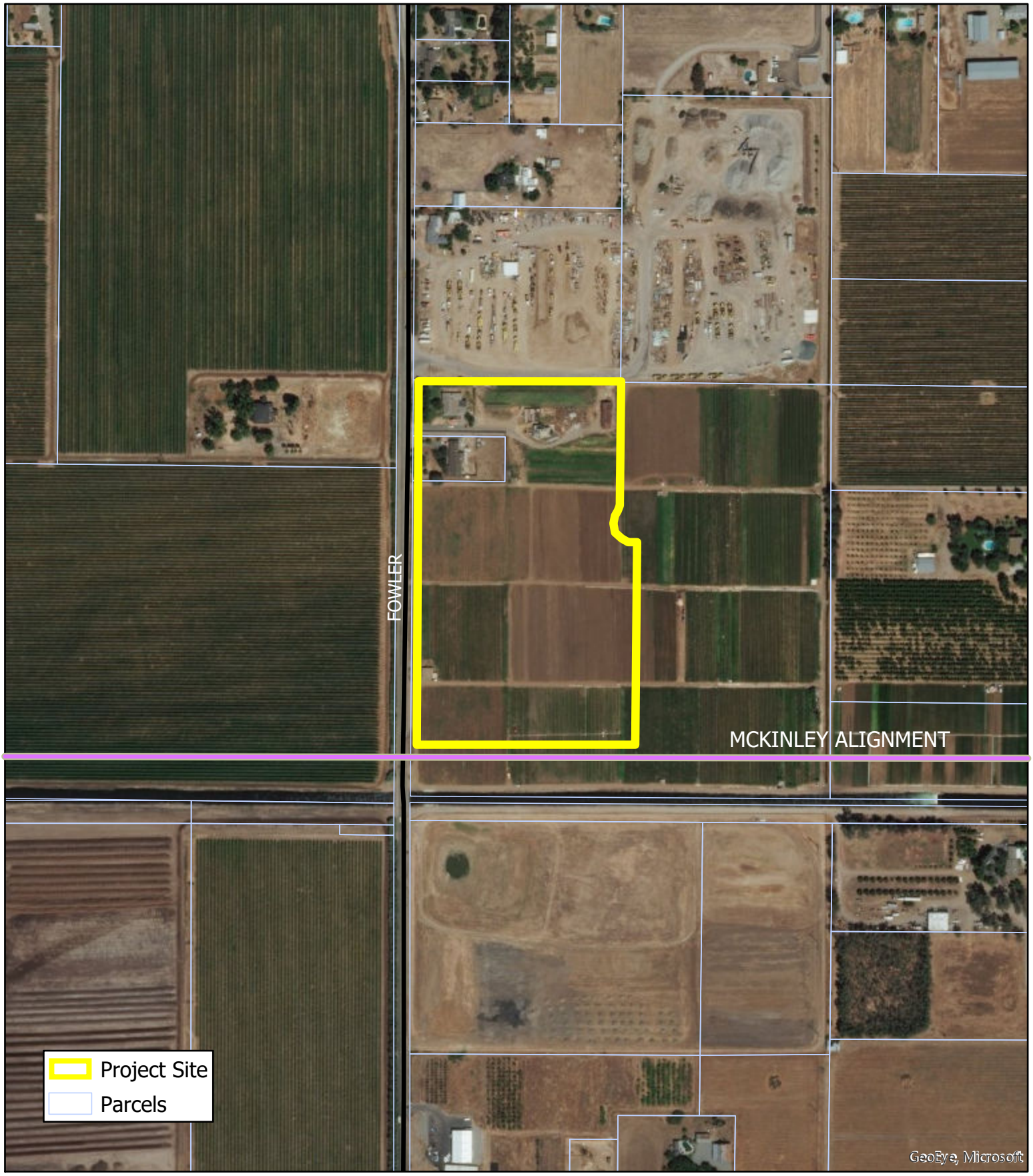
0 0.4 0.8 1.6 Miles

N



Project Site

Figure 3

Fowler-McKinley Elementary School Project
Clovis Unified School District

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0 0.05 0.1 0.2 Miles

N

B. Environmental Factors Potentially Affected

Based on the evaluations in Section E, the project would have a less than significant impact on the environmental factors listed in the following table. Those factors that require mitigation to be incorporated into the project to be less than significant are noted with an "X".

TABLE B-1
Environmental Factors Potentially Affected

X	Aesthetics		Agricultural & Forestry Resources	X	Air Quality
X	Biological Resources	X	Cultural Resources		Energy
	Geology & Soils		Greenhouse Gas Emissions		Hazards & Hazardous Materials
	Hydrology & Water Quality		Land Use & Planning		Mineral Resources
X	Noise		Population & Housing		Public Services
	Recreation	X	Transportation	X	Tribal Cultural Resources
	Utilities & Service Systems		Wildfire		Mandatory Findings of Significance

C. Determination

Based on this Initial Study, I find that the Fowler-McKinley Elementary School Project could have significant effects on the environment, but mitigation measures incorporated in the project by the Clovis Unified School District will avoid or reduce the effects to less than significant. Therefore, a Mitigated Negative Declaration will be prepared.

Signature	Date: 10/26/19
Michael Johnston	Assoc. Supt. Admin.
Print Name	Title

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D. Evaluation of Environmental Impacts

1. State CEQA Guidelines Appendix G: Environmental Checklist Form

Section E in this Initial Study addresses all of the environmental issues that Appendix G in the State CEQA Guidelines suggests an Initial Study should address. In addition, it addresses several environmental issues that the California Department of Education requires be considered in the selection and approval of a school site.

The discussion of each impact in Section E concludes with a determination that the impact is potentially significant, less than significant with mitigation, less than significant, or does not involve any impact (no impact).

The "potentially significant" determination is applied if there is substantial evidence that an effect may be significant. Under the State CEQA Guidelines, a significant effect, or impact, on the environment means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. (sec. 15382) The District must prepare an Environmental Impact Report for the project if the Initial Study identifies one or more potentially significant impacts.

The "less than significant impact with mitigation incorporated" determination applies when the incorporation by the District of mitigation measures in the project would reduce an impact from potentially significant to less than significant. This Initial Study describes each mitigation measure the District has incorporated in the project to reduce potentially significant impacts to a less than significant level.

The "less than significant" determination applies when the project would not result in a significant effect on a resource or condition. The less than significant determination is used only in cases where no mitigation measures are required to reduce an impact to a less than significant level.

The "no impact" determination applies when the project would have no impact on a resource or condition or the resource or condition does not apply to the project or its location. The no impact determination is used only in cases where no mitigation measures are required to avoid or eliminate an impact.

The discussion of impacts in this Initial Study lists each potential impact as stated in Appendix G, provides an analysis of the impact, describes each mitigation measure required to avoid the impact or reduce it to an insignificant level, and concludes with a determination of the level of significance of the impact. References to documents that would provide background information on an impact are provided where applicable.

This Initial Study incorporates by reference all documents and other sources of information cited in Sections E and H, Sources Consulted.

2. Existing Laws, Regulations, Policies, and Mitigation Measures

Introduction: In some cases, an impact that might appear significant is determined to be less than significant because it is subject to state, regional, or local laws, regulations, or policies, the application of which would reduce the impact to a less than significant level or avoid the impact entirely. In evaluating impacts, this Initial Study considered the applicable laws, regulations, and policies to determine the effect they would have on preventing or reducing potentially significant impacts. The Initial Study, however, does not cite them as mitigation measures because they would apply to the project regardless of the outcome of the Initial Study.

For the proposed project, applicable laws, regulations, and policies include but are not limited to the following:

State of California: The selection and approval of a site for a public school in California is subject to numerous state rules and regulations, most of which the California Department of Education administers to protect the health and safety of students and staff at the school. Before the Department of Education will approve a school site and the school becomes eligible for state funding, a school district must certify that "the proposed site is suitable for educational purposes and is free, or will be free prior to occupancy, from hazards that could be considered harmful to student and staff health and safety. The school district has complied with and will comply with all applicable laws and policies associated with the acquisition of the school site, including commitments for Department of Toxic Substances Control required activities…" (SFPD 4.03, 2). The state requirements include but are not limited to the following:

- *Education Code Section 17210-17224:* Specifies the environmental review process the Department of Toxic Substance Control (DTSC) administers for new school sites. DTSC ensures that proposed school sites are free of contamination or, if the properties were previously contaminated, that they have been cleaned up to a level that protects the students and staff who will occupy the new school. All proposed school sites that will receive State funding for acquisition or construction are required to go through a rigorous environmental review and cleanup process under DTSC's oversight.
- *Education Code Section 17212.5; California Code of Regulations, Title 5, Section 14010 Geological and Other Environmental Hazards Report:* District must prepare a Geological Hazards Report and other environmental hazards report as described in Appendix H of the *School Site Selection and Approval Guide, 2000 Edition*. This will include a survey of high-pressure pipelines, liquid storage tanks, railroads, airports, electrical transmission lines, and areas subject to flooding, dam inundation, seismic faulting, and liquefaction.
- *Education Code Section 17213, Public Resources Code Section 21151.8; and California Code of Regulations, Title 5, Section 14011[h],[i]; Title 14, Section 15093:* Requires District Board to adopt findings stating: (1) the proposed school site is not a current or former waste disposal site; (2) the site is not a hazardous substance release site; (3) the site does not contain pipelines; and (4) whether a qualified freeway and/or qualified traffic corridor is located within 500 feet of the site. In addition, requires board-adopted findings for hazardous air emitters and hazardous material handlers located within a 1/4 mile of the site.
- *Education Code Section 17215 and California Code of Regulations, Title 21, Division 2.5, Chapter 2.1:* airports: Requires providing a notice to the State Department of Education if a proposed school site is within two nautical miles, measured by air line, of that point on an airport runway or a potential runway included in an airport master plan that is nearest to the site. The Department of Education is required to consult with the Department of Transportation as to the safety of the site in relation to airport operations.
- *Public Resources Code Section 21151.2 and Government Code sections 53094, 65402[c]:* Require consultation with local Planning Commission to determine compatibility of proposed school site with general plan.
- *Public Resources Code Section 21151.4:* Addresses CEQA consultation requirements for the proposed construction or alteration of a facility within one-quarter mile of school that might reasonably be anticipated to emit or handling of hazardous or acutely hazardous material.
- *Title 5, California Code of Regulations, Article 2, Section 14010, Standards for School Site Selection:* The standards address: possible hazards related to power line easements, railroads, airports, major streets, above ground pipelines, underground pipelines, above ground storage tanks, traffic, noise, seismicity, geology, soils, flooding, dam flood inundation, incompatible zoning, and other safety-related factors.
- *Title 24, California Code of Regulations, Part 1 through Part 12:* Specifies the State of California building regulations for public schools. The Division of the State Architect is responsible for administering the regulations.

Central Valley Regional Water Quality Control Board

National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements General Permit for Discharges from Municipal Separate Storm Sewer Systems (MS4) (Order No RS-2016-0040, NPDES No CAS0085324)

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0040_ms4.pdf

San Joaquin Valley Air Pollution Control District
(https://www.valleyair.org/rules/1ruleslist.htm)

Regulation VIII – Fugitive PM10 Prohibitions and Regulation IX – Mobile and Indirect Sources

Fresno County Department of Public Health, Environmental Health
http://www.co.fresno.ca.us/DivisionPage.aspx?id=990

Public Health is responsible for permitting and inspecting retail food businesses, including school cafeterias, reviewing construction plans and inspection of new and remodeled food facilities, investigating complaints regarding violations involving unsanitary conditions, investigates suspected food borne illnesses, etc.

Fresno County

- Fresno County General Plan
- Fresno County Ordinance Code
  https://library.municode.com/ca/fresno_county/codes/code_of_ordinances
- Standard Drawings

City of Fresno

- Fresno General Plan
- Fresno Municipal Code
  https://library.municode.com/ca/fresno/codes/code_of_ordinances
- Standard Specifications and Drawings

Clovis Unified School District

- C.U.S.D. Building Specifications
  https://www.cusd.com/wp-content/uploads/2016/05/Final-CUSD-Building-Spec-5-17-2017.pdf

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E. Environmental Checklist

(The questions in Sections E, 1-20 are from the State CEQA Guidelines, Appendix G: Environmental Checklist Form, Evaluation of Environmental Impacts).

1. Aesthetics

a. Would the project have a substantial adverse effect on a scenic vista?

Less than Significant

The proposed project will not have a substantial adverse effect on a scenic vista. The site is flat and adjacent to a heavy equipment storage yard to the north and agricultural land designated for industrial use to the west. There is one existing home to the west of the site west of Fowler Avenue. Its view of the school site will be obscured by a tall thick hedge that exists along the west side of Fowler Avenue. No homes are located east or south of the site. Distant views of the Sierra Nevada to the east and northeast are sometimes evident but frequently obscured due to poor air quality and atmospheric conditions. The proposed school would not obstruct the view of any homes. The Fresno General Plan and Development Code Update Master Environmental Impact Report did not identify or designate any scenic vistas within or near the project area.

b. Would the project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact

There are no scenic highways within the project area. The Fresno General Plan and Development Code Update Master Environmental Impact Report and visual reconnaissance of the project site did not identify any scenic resources within or near the project area.

c. Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant

The project site is located in an area transitioning from rural to urban. This change is inevitable, as the City of Fresno has planned the site and surrounding land for urban development. An urban subdivision (Tentative Tract No. 6214) has been approved by the City of Fresno to the east and north of the site and will likely be substantially constructed before the school. Schools are typically a common and congruent visual feature within residential areas. Elementary schools designed for suburban predominantly residential neighborhoods typically have classroom and administrative buildings which are visually compatible or congruent with the surrounding community.

d. Would the project create a new source of light and glare that would adversely affect day or nighttime views in the area?

Less than Significant with Mitigation

The project will increase light and glare in its vicinity. Project buildings and parking areas will be lighted in the evenings for the safety and security of the students and staff. The project would also include lighted athletic facilities. Headlights from vehicles arriving and departing the school during evening hours would be the only potential source of glare from the project. The project lighting would not be unusual within the planned urban environment surrounding the site and would have no effect on agricultural operations nearby. However, to ensure that adjacent existing and future land uses are not significantly impacted, the following mitigation measures will be incorporated in the project.

- **Mitigation Measure AE-1:** All parking area lighting shall have full cut-off type fixtures. A full cut-off type fixture is a luminaire or lighting fixture that, by design of the housing, does not allow any light dispersion or direct glare to shine above a 90-degree horizontal plane from the base of the fixture. Full cut-off type fixtures must be installed in a horizontal position as designed.
- **Mitigation Measure AE-2:** Athletic facilities lighting shall be designed to prevent direct glare and minimize spill over illumination on adjoining properties.
- **Mitigation Measure AE-3:** All external signs and lighting shall be lit from the top and shine downward except where uplighting is required for safety or security purposes. The lighting shall also be, as much as physically possible, contained to the target area.
- **Mitigation Measure AE-4:** Exterior building lighting for security or aesthetics shall be full cut-off or a shielded type design to minimize any upward distribution of light.
- **Mitigation Measure AE-5:** Non-essential lighting shall be turned off by 10:00 pm.

2. Agriculture and Forestry Resources

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?

No New Impact (Previously Addressed in MEIR)

According to the Fresno County Important Farmland Map (DOC 2014), the proposed 22-acre project site is Prime Farmland. Prime Farmland refers to "Farmland with the best combination of physical and chemical features able to sustain long term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date." The conversion of approximately 9,550 acres of Prime Farmland to urban use within the City of Fresno's Sphere of Influence, including the 22-scre proposed project site, has been evaluated and covered under the Fresno General Plan and Development Code Update Master Environmental Impact Report (MEIR). Urban residential development in accordance with the General Plan is approved for construction on land to the north and east of the site (Tentative Tract No. 6214), and industrial development is planned to the west of the site, west of Fowler Avenue. The viability of continued agricultural use of the land will be substantially compromised by this future development whether or not the future school is constructed. Therefore, the project will not create any new agricultural conversion impact not previously considered in the City's MEIR.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Less than Significant

The proposed project site is not under Williamson Act contract (DOC 2016).

The project site is zoned by Fresno County as Exclusive Agriculture (AE-20). The AE-20 Zone is an exclusive zone for intensive agricultural uses and for those uses which are a necessary and integral part of the agricultural operation.

Although the project site is zoned for agricultural use by Fresno County, it is within the City of Fresno's sphere of influence and is designated in the City of Fresno General Plan for Public Facility/Elementary School use. An urban residential subdivision (Tentative Tract No. 6214) has been approved to the north and east of the school site and would likely be constructed prior to the school. The site will be annexed to the City of Fresno prior to construction and zoning of the site will change to an institutional zone district that will accommodate the school use.

c. Would the project conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned timberland production?

No Impact

The proposed school project would have *no impact* on forestland or timberland. The site is not in an area where these resources exist.

d. Would the project result in the loss of forestland or conversion of forestland to non-forest use?

This impact is addressed in Section E, 2, c.

e. Would the project 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?

Less than Significant

Developing school facilities adjacent to farmland could result in changes to farming practices. For example, farmers could be subject to additional restrictions on the types of herbicides and pesticides they could apply near the school property and the methods of application they could employ. Farming practices that generate dust and noise could be a nuisance to schools. However, as a practical matter, Clovis Unified and many other districts in Fresno County and the San Joaquin Valley successfully operate schools adjacent to active agricultural operations.

In this case, the school site and surrounding area is within the City of Fresno sphere of influence and designated in the City's General Plan for urban development (residential east of Fowler Avenue and industrial west of Fowler Avenue). An urban residential subdivision (Tentative Tract No. 6214) has been approved by the City of Fresno north and east of the school site, which will likely develop prior to the school site. Given these factors, the area around the school site will develop with urban uses whether or not the project is approved.

The proposed project site is nearby to several active agricultural operations. The owners of nearby agricultural properties were notified of the project and provided with the Request of Preliminary Comment prior to the preparation of this Initial Study. No comment was received from adjacent agricultural land owners.

3. Air Quality

This section is based on an Air Quality Analysis (Ambient 2018a) completed for the project, which is included as Appendix 1 to this Initial Study. (Table E-3-1 provides definitions for the air quality terms used in this section.)

TABLE E-3-1
Air Quality Definitions

Carbon Monoxide (CO)

A colorless, odorless gas resulting from the incomplete combustion of hydrocarbon fuels. CO interferes with the blood's ability to carry oxygen to the body's tissues and results in numerous adverse health effects. Over 80 percent of the CO emitted in urban areas is contributed by motor vehicles. CO is a criteria air pollutant.

Nitrogen Oxides (Oxides of Nitrogen, NO_X)

A general term pertaining to compounds of nitric oxide (NO), nitrogen dioxide (NO_2) and other oxides of nitrogen. Nitrogen oxides are typically created during combustion processes and are major contributors to smog formation and acid deposition. NO_2 is a criteria air pollutant and may result in numerous adverse health effects.

Particulate Matter (PM)

Any material, except pure water, that exists in the solid or liquid state in the atmosphere. The size of particulate matter can vary from coarse, wind-blown dust particles to fine particle combustion products.

$PM_{2.5}$

Includes tiny particles with an aerodynamic diameter less than or equal to a nominal 2.5 microns. This fraction of particulate matter penetrates most deeply into the lungs.

PM_{10}

A criteria air pollutant consisting of small particles with an aerodynamic diameter less than or equal to a nominal 10 microns (about 1/7 the diameter of a single human hair). Their small size allows them to make their way to the air sacs deep within the lungs where they may be deposited and result in adverse health effects. PM10 also causes visibility reduction.

Reactive Organic Gas (ROG)

A photochemically reactive chemical gas, composed of non-methane hydrocarbons, that may contribute to the formation of smog. Also, sometimes referred to as Non-Methane Organic Gases (NMOGs). (See also Volatile and Hydrocarbons.)

Sulfur Dioxide (SO_2)

A strong smelling, colorless gas that is formed by the combustion of fossil fuels. Power plants, which may use coal or oil high in sulfur content, can be major sources of SO_2 and other sulfur oxides contribute to the problem of acid deposition. SO_2 is a criteria air pollutant.

Source: California Air Resources Board. *Glossary of Air Pollution Terms* (2015)

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant with Mitigation

In accordance with San Joaquin Valley Air Pollution Control District (SJVAPCD)-recommended methodology for the assessment of air quality impacts, projects that result in significant air quality impacts at the project level are also considered to have a significant cumulative air quality impact. As noted in Sections E, 3, b, short-term construction and long-term operational emissions would not exceed applicable thresholds. In addition, the proposed project's contribution to localized concentrations of emissions, including emissions of CO, TACs, and odors, are considered less than significant. However, as noted in Section E, 3, d, the proposed project could result in a significant contribution to localized PM concentrations for which the SJVAB is currently designated non-attainment. For this reason, implementation of the proposed project could conflict with air quality attainment or maintenance planning efforts. This impact would be considered potentially significant. Refer to Sections E, 3, b, and E, 3, c for additional discussion of air quality impacts.

Mitigation Measure: Implement Mitigation Measure AQ-1 (refer to Section E, 3, c)

NOTE: The project will be subject to applicable SJVAPCD rules and regulations, including but not limited to: Regulation VIII for the control of fugitive dust emissions and Rule 9510 (Indirect Source Review).

b. Would the project violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation?

Less than Significant

Short-term Construction Emissions

Short-term increases in emissions would occur during the construction process. Construction-generated emissions are of temporary duration, lasting only as long as construction activities occur, but have the potential to represent a significant air quality impact. The construction of the proposed project would result in the temporary generation of emissions associated with site grading and excavation, paving, motor vehicle exhaust associated with construction equipment and worker trips, as well as the movement of construction equipment on unpaved surfaces. Short-term construction emissions would result in increased emissions of ozone-precursor pollutants (i.e., ROG and NO_X) and emissions of PM. Emissions of ozone-precursors would result from the operation of on-road and off-road motorized vehicles and equipment. Emissions of airborne PM are largely dependent on the amount of ground disturbance associated with site preparation activities and can result in increased concentrations of PM that can adversely affect nearby sensitive land uses.

Estimated construction-generated annual emissions associated with the proposed project alternatives are summarized in Ambient 2018a, Table 5.

As noted in Ambient 2018a, Table 5, construction of the proposed project would generate maximum uncontrolled annual emissions of approximately 0.7 tons/year of ROG, 3.0 tons/year of NO_X, 2.5 tons/year of CO, 0.4 tons/year of PM_{10}, and 0.2 tons/year of $PM_{2.5}$. Emissions of SO_2 would be negligible (e.g., less than 0.1 tons/year). Estimated construction-generated emissions would not exceed the SJVAPCD's significance thresholds of 10 tons/year of ROG, 10 tons/year of NO_X, or 15 tons/year PM_{10}.

Estimated daily on-site construction emissions are summarized in Ambient 2018a, Table 6. As noted in Ambient 2018a, Table 6, construction of the proposed project would generate maximum uncontrolled on-site emissions of approximately 16 lbs/day of ROG, 78 lbs/day of NO_X, 46 lbs/day of CO, 20 lbs/day of PM_{10}, and 12 lbs/day of $PM_{2.5}$. Emissions of SO_2 would be negligible (e.g., less than 0.1 tons/year). Daily on-site construction emissions would not exceed the SJVAPCD's recommended localized ambient air quality significance thresholds of 100 lbs/day for each of the criteria air pollutants evaluated.

Short-term construction of the proposed project would not result in a significant impact to regional or local air quality conditions. Furthermore, it is important to note that the proposed project would be required to comply with SJVPACD Regulation VIII (Fugitive PM_{10} Prohibitions). Mandatory compliance with SJVAPCD Regulation VIII would further reduce emissions of fugitive dust from the project site and minimize the project's potential to adversely affect nearby sensitive receptors. With compliance with SJVAPCD Regulation VIII, emissions of PM would be reduced by approximately 50 percent, or more. Given that project-generated emissions would not exceed applicable SJVAPCD significance thresholds, this impact would be considered less than significant.

Long-term Operational Emissions

Estimated annual operational emissions for the proposed project are summarized in Ambient 2018a, Table 7. As depicted, the proposed project would result in operational emissions of approximately 0.7 tons/year of ROG, 4.3 tons/year of NO_X, 3.3 tons/year of CO, 0.8 tons/year of PM_{10}, and 0.3 tons/year of $PM_{2.5}$ during the initial year of operation. Emissions of SO_2 would be negligible (i.e., less than 0.1 tons/year). Operational emissions would be projected to decline in future years, with improvements in fuel-consumption emissions standards. Operational emissions would not exceed SJVAPCD's mass-emissions significance thresholds.

Estimated average-daily on-site operational emissions are also summarized in Ambient 2018a, Table 7. As noted, average-daily on-site operational emissions would be largely associated with area sources. Emissions would be largely associated with occasional landscape maintenance activities, as well as, evaporative ROG emissions associated with the application of architectural coatings and use of consumer products. Average-daily on-site emissions of ROG would total approximately 3 lbs/day. Average-daily on-site emissions of other pollutants would be negligible (i.e., less than 0.1 lbs/day). Average-daily on-site emissions would not exceed the SJVAPCD's recommended localized ambient air quality significance thresholds of 100 lbs/day for each of the criteria air pollutants evaluated.

Long-term operation of the proposed project would not result in a significant impact to regional or local air quality conditions. It is important to note that estimated operational emissions are conservatively based on the default vehicle fleet distribution assumptions contained in the model, which include contributions from medium and heavy-duty trucks. Mobile sources associated with schools typically consist largely of light-duty vehicles and buses. As a result, actual mobile source emissions would likely be less than estimated. This impact is considered less than significant.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant with Mitigation

Sensitive land uses located in the vicinity of the proposed project site consist predominantly of residential land uses. The nearest residential land use is located approximately 350 feet west of the project site, across Fowler Avenue. Long-term operational and short-term construction activities and emission sources that could adversely impact these nearest sensitive receptors are discussed below:

Long-term Operation

Localized Mobile-Source CO Emissions

Carbon monoxide is the primary criteria air pollutant of local concern associated with the proposed project. Under specific meteorological and operational conditions, such as near areas of heavily congested vehicle traffic, CO concentrations may reach unhealthy levels. If inhaled, CO can be adsorbed easily by the blood stream and can inhibit oxygen delivery to the body, which can cause significant health effects ranging from slight headaches to death. The most serious effects are felt by individuals susceptible to oxygen deficiencies, including people with anemia and those suffering from chronic lung or heart disease.

Mobile-source emissions of CO are a direct function of traffic volume, speed, and delay. Transport of CO is extremely limited because it disperses rapidly with distance from the source under normal meteorological conditions. For this reason, modeling of mobile-source CO concentrations is typically recommended for sensitive land uses located near signalized roadway intersections that are projected to operate at unacceptable levels of service (i.e., LOS E or F). Localized CO concentrations associated with the proposed project would be considered less-than-significant impact if: (1) traffic generated by the proposed project would not result in deterioration of a signalized intersection to a level of service (LOS) of E or F; or (2) the project would not contribute additional traffic to a signalized intersection that already operates at LOS of E or F.

Signalized intersections in the project area include the Clinton Avenue/Fowler Avenue and the Olive Avenue/Fowler Avenue intersections. With implementation of the proposed traffic improvements, these intersections are projected to operate at LOS D, or better, for existing-plus-project, near-term, and future cumulative conditions (JLB 2018). In comparison to the CO screening criteria, implementation of the proposed project would not result in or contribute to unacceptable levels of service (i.e., LOS E, or worse) at nearby signalized intersections. As a result, the proposed project would not be anticipated to contribute substantially to localized CO concentrations that would exceed applicable standards. For this reason, this impact would be considered less than significant.

Toxic Air Contaminants

No major stationary sources of Toxic Air Contaminants (TACs) or major agricultural operations are located within one-quarter mile of the project site (SJVAPCD 2018). In addition, the project site is not located within 500 feet of a freeway or other busy traffic corridor. Predicted on-site health risks for on-site student and staff are anticipated to be minor and would not be anticipated to exceed the SJVAPCD's significance thresholds. In addition, implementation of the proposed project would not result in the long-term operation of any major on-site stationary sources of TACs, nor would project implementation result in a significant increase in diesel-fueled vehicles traveling along area roadways. For these reasons, long-term exposure to TACs would be considered less than significant.

Short-term Construction

Naturally Occurring Asbestos

Naturally-occurring asbestos, which was identified by California Air Resources Board (ARB) as a TAC in 1986, is located in many parts of California and is commonly associated with ultramafic rock. The project site is not located near any areas that are likely to contain ultramafic rock (DOC 2000). As a result, risk of exposure to asbestos during the construction process would be considered less than significant.

Diesel-Exhaust Emissions

Implementation of the proposed project would result in the generation of Diesel Particulate Matter (DPM) emissions during construction associated with the use of off-road diesel equipment for site grading and excavation, paving and other construction activities. Health-related risks associated with diesel-exhaust emissions are primarily associated with long-term exposure and associated risk of contracting cancer. For residential land uses, the calculation of cancer risk associated with exposure of to TACs are typically calculated based on a 25 to 30-year period of exposure. The use of diesel-powered construction equipment, however, would be temporary and episodic and would occur over a relatively large area. Assuming that construction activities involving the use of diesel-fueled equipment would occur over an approximate 18-

month period, project-related construction activities would constitute less than six percent of the typical exposure period. As a result, exposure to construction-generated DPM would not be anticipated to exceed applicable thresholds (i.e., incremental increase in cancer risk of 20 in one million). In addition, implementation of Mitigation Measure AQ-1 would result in further reductions of on-site DPM emissions. For these reasons, this impact would be considered less than significant.

Localized PM Concentrations

Construction of the proposed project may result in the generation of fugitive dust. Fugitive dust emissions would be primarily associated with earth-moving, material handling and demolition activities, as well as, vehicle travel on unpaved and paved surfaces. On-site off-road equipment and trucks would also result in short-term emissions of diesel-exhaust PM. Fugitive dust can also be generated during the clearing of vegetation, including the burning of vegetative material. Uncontrolled emissions of fugitive dust may contribute to increased occurrences of Valley Fever and may also result in increased nuisance impacts to nearby land uses and receptors. As a result, localized uncontrolled concentrations of construction-generated PM would be considered to have a potentially-significant impact.

The following measures shall be implemented to reduce potential expose of sensitive receptors to localized concentrations of PM emissions at nearby land uses during project construction:

Mitigation Measure AQ-1. The following measures shall be implemented to reduce potential exposure of nearby sensitive receptors to localized concentrations of construction-generated PM:

a. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:

    1) Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,

    2) Shall not operate a diesel-fueled auxiliary power system to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.

b. Off-road diesel equipment shall comply with the 5 minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use off-Road Diesel regulation. The specific requirements and exceptions in the regulations can be reviewed at the following web sites: www.arb.ca.gov/msprog/truck-idling/2485.pdf and ww.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf.

c. Signs shall be posted at the project site construction entrance to remind drivers and operators of the state's 5 minute idling limit.

d. To the extent available, replace fossil-fueled equipment with alternatively-fueled (e.g., natural gas) or electrically-driven equivalents.

e. Construction truck trips shall be scheduled, to the extent feasible, to occur during non-peak hours.

f. The burning of vegetative material shall be prohibited.

g. The proposed project shall comply with SJVAPCD Regulation VIII for the control of fugitive dust emissions. Regulation VIII can be obtained on the SJVAPCD's website at website URL: https://www.valleyair.org/rules/1ruleslist.htm. At a minimum, the following measures shall be implemented:

    1) All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover.

    2) All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.

3) All land clearing, grubbing, scraping, excavation, land leveling, grading, cut & fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.
4) With the demolition of buildings up to six stories in height, all exterior surfaces of the building shall be wetted during demolition.
5) When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.
6) All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions.) (Use of blower devices is expressly forbidden.)
7) Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.
8) On-road vehicle speeds on unpaved surfaces of the project site shall be limited to 15 mph.
9) Sandbags or other erosion control measures shall be installed sufficient to prevent silt runoff to public roadways from sites with a slope greater than one percent.
10) Excavation and grading activities shall be suspended when winds exceed 20 mph (Regardless of wind speed, an owner/operator must comply with Regulation VIII's 20 percent opacity limitation).

h. The above measures for the control of construction-generated emissions shall be included on site grading and construction plans.

d. Would the project result in objectionable odors affecting a substantial number of people?

Less than Significant

The occurrence and severity of odor impacts depends on numerous factors, including: the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and regulatory agencies.

No major sources of odors have been identified in the project area. However, construction of the proposed project would involve the use of a variety of gasoline or diesel-powered equipment that would emit exhaust fumes. Exhaust fumes, particularly diesel-exhaust, may be considered objectionable by some people. In addition, pavement coatings and architectural coatings used during project construction would also emit temporary odors. However, construction-generated emissions would occur intermittently throughout the workday and would dissipate rapidly within increasing distance from the source. As a result, short-term construction activities would not expose a substantial number of people to frequent odorous emissions.

4. Biological Resources

A Biological Resources Assessment (Odell 2018) was prepared for this project and is included as Appendix 2 to this Initial Study. This Initial Study uses information from the analysis to evaluate the proposed school project.

a. Would the project 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 Game or U. S. Fish and Wildlife Service?

Less than Significant with Mitigation

The project site consisted of active agricultural land (row crops), and rural residential development. As such, the project site has been disturbed from its natural state for many years. Although loss of agricultural land may result in decreased foraging area for some species, such land is of limited habitat value for sensitive plant and wildlife species, especially due to the amount of disturbance from humans, vehicles, and domestic animals on a regular basis. The direct impacts of the proposed school will be a loss of marginal habitat and possible direct mortality for any animals in the path of construction equipment. Direct mortality could occur to roosting bats during building demolition (such as pallid bat (*Antrozous pallidus*) and other common species), as well as to common fossorial or slow-moving mammals and reptiles within the project area. Direct mortality could occur to common fossorial or slow-moving mammals and reptiles within the project area. Direct take could also occur for bird eggs and nestlings within the project area if vegetation removal or ground disturbance occur during the nesting season, generally February 1 through August 31. In addition to Migratory Bird Treaty Act (MBTA)-covered bird species, other special status bird species that could occur in the vicinity include Swainson's hawk (*Buteo swainsoni*), white-tailed kite (*Elanus leucurus*), loggerhead shrike (*Lanius ludovicianus*), Lawrence's goldfinch (*Spinus lawrencei*), yellow-billed magpie (*Pica nuttalli*), Nuttall's woodpecker (*Picoides nuttallii*), oak titmouse (*Baeolophus inornatus*), and burrowing owl (*Athene cunicularia*) (Odell 2018 Appendix A). The project is not expected to result in direct take of any special status plant species (Odell 2018 Appendix B). Indirect impacts to species that may still use the area after construction could include decreased dispersal, increased mortality and injury, and increased debris that through ingestion or physical contact can be harmful to wildlife. All these impacts are caused by the increase in human disturbance (vehicles, people, and pets). However, impacts to special status species can be minimized to a less than significant impact with the incorporation of avoidance and minimization measures.

Special Status Species Impacts and Avoidance Measures

Database queries indicated 50 animals and 15 plant species with special status occur or have historically occurred within the 9-quad search area (Odell 2018 Appendices A and B). Many of the species from the generated list either were historic, extirpated occurrences, or were species with very specialized habitat requirements that were not present on the site or within the vicinity. Therefore, the majority of the species were "ruled out". Based on the habitat types present within the study area, 9 special status wildlife species have the potential to occur on the site.

Special Status Bats

The pallid bat (*Antrozous pallidus*) inhabits deserts, grasslands, scrublands, woodlands and open forests. They are most common in open, dry habitats with rocky areas for roosting. Bridges, buildings, and exfoliating tree bark or hollows are frequently used by this species for roost sites (H.T. Harvey 2004). Pallid bats will roost alone or in both large and small groups. Breeding occurs from October to February. Pups are born from late April to July and are volant at 4 to 6 weeks of age. Breeding colonies disperse between August and October. Therefore, within the project area, the older rural residence and associated outbuildings, and the exfoliating bark and hollows of the mature trees are potential suitable roosting habitat. Open water of Mill Ditch and the ponding basin (adjacent to the project area) (Odell 2018 Figure 4) provides a water and food source for bats.

Impact

No evidence of bat occupation was observed during reconnaissance surveys. However, access to the residences was not permitted during the survey, so occupation is unknown. Frequent human disturbance and associated noise throughout the project area (traffic, pedestrians, pets, agricultural operation) likely discourages bat roosting. Pallid bats are very sensitive to disturbance of roost sites. Disturbance reduces metabolic economy and can greatly impact species survival (Orr 1954, Zeiner et al. 1990*b*). Nighttime light associated with the project and sound disturbances near roosting areas and maternal colonies may disturb this species and affect bat foraging. The likelihood that pallid bat occupies the project area is very low, as disturbance makes the habitat somewhat marginal. However, direct mortality to bats could occur if a structure is demolished prior to bat eviction. Vibration, noise, and light caused by construction equipment

could result in roost abandonment and/or mortality of juvenile bats, if present. However, the incorporation of the following measures would minimize the impacts to less than significant.

Mitigation for Special Status Bats

BR-1: Pre-construction Surveys:

Prior to the onset of construction activity, a California Department of Fish and Wildlife (CDFW)-approved biologist will conduct pre-construction surveys for active roosting, breeding, or hibernacula sites (roosts) in large trees and buildings within the project area. Construction/building demolition will not take place as long as a roost site is occupied. Therefore, depending on when construction begins, bat surveys should be timed to be prior to the change in season (maternity vs. hibernation) so that special status bats can be correctly excluded without take (see seasons below). If no active bat roosts, breeding, or hibernacula sites are detected, no further action is required.

BR-2: Avoidance & Minimization:

a. If any active bat sites are discovered or if evidence of recent occupation is established, the following measures will be implemented in order to minimize impacts on special status bats:

   1) Construction will be scheduled to minimize impacts upon pallid bats. Type and status of active roosts shall be determined, and bat eviction shall be undertaken in a manner that does not exclude bats during times of inclement weather or exclude females from young still in a roost.

   2) Hibernation sites with evidence of prior occupation will be sealed before the hibernation season (November–March), and nursery sites will be sealed before the nursery season (April–August).

   3) If the site is occupied by the bats, then construction will occur outside the hibernation season (for hibernacula), and after August 15 (for nursery colonies). Construction/building demolition will not take place as long as the roost site is occupied.

   4) If exclusion devices are used, they will be employed based on current best practices and will be regularly monitored by a qualified biologist.

b. All new lighting shall be down-cast to reduce disturbance impacts to bat species.

Special Status Birds

Eight special status avian species (Swainson's hawk, white-tailed kite, loggerhead shrike, Lawrence's goldfinch, yellow-billed magpie, Nuttall's woodpecker, oak titmouse, and burrowing owl) have the potential to nest and/or forage within the study area. Greater detail regarding life history requirements of these birds is provided in Odell 2018 Appendix A. Swainson's hawk, white-tailed kite, Lawrence's goldfinch, yellow-billed magpie, Nuttall's woodpecker, and oak titmouse could nest in the large trees within and adjacent to the study area. Loggerhead shrike could nest in shrubs or trees within and adjacent to the study area and forage in the open fields. Although none were detected during reconnaissance survey, burrowing owls could move into the area prior to construction, and occupy any large burrows during the nesting and wintering seasons.

Impact

Since CDFW usually requires a various sized "no disturbance" buffers around nesting sites for these species, construction-related disturbance could be considered take under California Endangered Species Act (CESA) and MBTA. Specific impacts to burrowing owl according to the *Staff Report on Burrowing Owl Mitigation* (CDFG 1995) include any "disturbance within 50 meters (approx. 160 ft) [75 m (250 ft) during breeding season] which may result in harassment of owls at occupied burrows; destruction of natural and artificial burrows (culverts, concrete slabs and debris piles that provide shelter to burrowing owls); and destruction and/or degradation of foraging habitat adjacent (within 100 m) of an occupied burrow(s)".

In addition, other migratory birds will likely be nesting in the study area and vicinity, most of which are protected by the Migratory Bird Treaty Act (USCA 1918). Both construction related disturbance and the removal of vegetation within the project area could result in nest abandonment or direct mortality of eggs, chicks, and/or fledglings. This type of impact to migratory birds, including special status bird species, would

be considered take under the MBTA and CESA, and therefore, is a potentially significant impact. In order to avoid impacts to avian species, nests and nesting habitat should not be disturbed or destroyed. The following measures will reduce potential impacts to a less than significant level.

Mitigation for Special Status Birds:

BR-3: Avoidance:

If feasible, any vegetation removal will take place between September 1 and February 1 to avoid impacts to nesting birds in compliance with the Migratory Bird Treaty Act. If vegetation removal must occur during the nesting season, project construction may be delayed due to actively nesting birds and their required protective buffers.

BR-4: Pre-construction Surveys:

a. If vegetation removal or ground disturbance will commence between February 1 and August 31, a qualified biologist will conduct a pre-construction survey for nesting birds within 14 days of the initiation of disturbance activities. This survey will cover:

    1) Potential nest sites in trees, bushes, or grass within species-specific buffers of the project area (Swainson's hawk – 0.5-mile, other raptor species such as white-tailed kite – 500 ft, non-raptor species (loggerhead shrike, magpie etc. – 250 ft).

    2) Survey protocol developed by the Swainson's Hawk Technical Advisory Committee (TAC) should be followed (CDFG 2000), which includes survey timing and requirements for repeated visits.

b. Surveys for burrowing owl will occur within 14 days prior to any ground disturbance, no matter the season. This survey will cover potential burrowing owl burrows in the project area and suitable habitat within 150 m (500 ft). Evaluation of use by owls shall be in accordance with California Department of Fish and Wildlife survey guidelines (CBOC 1993, CDFG 1995, CDFG 2012). Surveys will document if burrowing owls are nesting or using habitat in or directly adjacent to the project area. Survey results will be valid only for the season (breeding (Feb 1-Aug 31) or non-breeding (Sept 1-Jan 31) during which the survey is conducted.

c. If no active nests or burrows are detected during the pre-construction survey, then no further action is required. If an active nest or burrow is detected, then the following minimization measures will be implemented.

BR-5: Minimization/Establish Buffers:

a. Swainson's hawk, white-tailed kite, loggerhead shrike, Lawrence's goldfinch, yellow-billed magpie, Nuttall's woodpecker, oak titmouse, and MBTA-protected species:

    If any active nests are discovered (and if construction will occur during bird breeding season), the U.S. Fish and Wildlife Service (USFWS) and/or CDFW will be contacted to determine protective measures required to avoid take. These measures could include fencing off an area where a nest occurs, or shifting construction work temporally or spatially away from the nesting birds. Biologists are required on site to monitor construction while protected migratory birds are nesting in the project area. If an active nest is found after the completion of the pre-construction surveys and after construction begins, all construction activities will stop until a qualified biologist has evaluated the nest and erected the appropriate buffer around the nest.

b. Burrowing owl:

    If burrowing owls are detected within the survey area, CDFW should be consulted to determine the suitable buffer. These buffers will consider the level of disturbance of the project activity, existing disturbance of the site (vehicle traffic, humans, pets, etc.), and time of year (nesting vs. wintering). If avoidance is not feasible, the District will work with CDFW to determine appropriate mitigation, such as passive exclusion or translocation, and associated mitigation land offset (CDFG 2012).

BR-6: If avoidance is not possible, a qualified biologist will develop appropriate mitigation that will reduce project impacts to sensitive biological resources to a less than significant level. The type and amount of

mitigation will depend on the resources impacted, the extent of the impacts, and the quality of habitats to be impacted. Mitigation may include but are not limited to: 1) Compensation for lost habitat in the form of preservation or creation of in-kind habitat protected by conservation easement; 2) Purchase of appropriate credits from an approved mitigation bank or land trust servicing the Fresno County Area; 3) Payment of in-lieu fees.

Special Status Plants

Of the 15 potentially occurring special status plant species, none were found within the project area. Although the site survey was not conducted at the peak blooming period for some potentially occurring special status plants, all plants could be ruled out because their elevation range, required habitat, and/or soil type differed from the site conditions. Therefore, the project will not impact any special status plant species.

b. Would the project have a substantially adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Wildlife Service?

No Impact

There are no riparian or sensitive natural communities within the project area.

c. Would the project 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?

No Impact

There are no federally protected wetlands within the project area. Implementation of typical ground disturbance and erosion control Best Management Practices (BMPs) and compliance with grading permits will insure that there is no impact to storm drainage facilities or nearby canals.

d. Would the project interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant

The site does not appear to constitute a "movement corridor" for native wildlife (USFWS 1998) that would attract wildlife to move through the site any more than the surrounding developed and agricultural lands. The project site is bordered by busy streets as well as industrial and agricultural development, which restricts access for wildlife. Smaller wildlife species and birds are not expected to be further inhibited by the project as compared with residential and agricultural uses. Therefore, the project will have a less than significant effect on regional wildlife movements (MO).

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact

The project appears to be consistent with relevant biological resources policies of the City of Fresno and would not conflict with local policies or ordinances protecting biological resources (City of Fresno 2014).

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?

No Impact

Fresno County is not part of any HCP or NCCP, so the project would not conflict any provisions of any local, regional or state habitat conservation plan (MO, USFWS 1998, 2005).

5. Cultural Resources

A Cultural Resources Records Survey (Sierra 2018) was conducted by Sierra Valley Cultural Planning and is included as Appendix 3 to this Initial Study. This Initial Study uses information from the survey to evaluate the proposed school project.

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant with Mitigation

Prior to field inspection, an in-house records search was completed at the Southern San Joaquin Valley Information Center (SSJVIC) of the California Historical Resources Information System to identify areas previously investigated and to identify known cultural resources present within or in close proximity to the project area of potential effects (APE). According to the Information Center records, there are no prehistoric or historic-period sites or structures identified within the project APE, and no resources are identified within a ½-mile radius of the study area. There have been have been no previous investigation within the APE, and none within a ½-mile radius of the parcel. No cultural resource sites listed on the National Register of Historic Places, the California Register of Historic Resources, California Points of Historical Interest, State Historic Landmarks, or the California Inventory of Historic Resources have been documented either in or within ½-mile radius of the project APE.

Two historic-era structures, built prior to 1921, are located within the northeast corner of the 22-acre study area and include a two-story wood frame house on a concrete block foundation and a single-story rectangular-shaped wood frame barn/shed with a poured concrete floor. The house appears to have been unoccupied for quite some time and is in a poor state of repair; the original windows have been replaced with sliding aluminum windows. The barn is also in a poor condition. While the house does retain several architectural details, including an open wrap around front porch with wooden support pillars, decorative architectural details under the eaves, and a stylized roofline, it does not retain architectural integrity due to replacement of the original wood-framed fenestration with aluminum sliders and the addition of a single story shed at the rear of the house. The barn is a simple utilitarian structure lacking any particular stylistic elements. Neither structure appears eligible for listing on the National Register of Historic Places nor the California Register of Historic Resources; therefore, no further study is recommended.

No significant or important archaeological or other cultural resources were identified as a result of this study. Therefore, it is unlikely that the proposed action will have an effect on important archaeological, historical, or other cultural resources. No further cultural resources investigation is therefore recommended.

In the unlikely event that subsurface historical, archaeological or paleontological resources are discovered during construction, the following mitigation measures will be incorporated into the project.

- **Mitigation Measure CR-1:** If subsurface historic or prehistoric archaeological or paleontological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified cultural resources professional or paleontologist shall be consulted to determine whether the resource requires further study. If the resources are determined to be significant, mitigation measures shall be identified by the cultural resources professional or paleontologist and recommended to the District. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds.
- **Mitigation Measure CR-2:** If human remains are unearthed during excavation and/or construction activities, all activity shall cease immediately. No further disturbance shall occur until the County

Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendent of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the District shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the District has discussed and conferred with the most likely descendants regarding their recommendations.

6. Energy Resources

Would the project:

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

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

Less than Significant

The plans for all public school projects in California must be submitted to the Division of the State Architect (DSA) for plan review and must comply with DSA and California Energy Commission (CEC) Energy Efficiency Standards. These requirements ensure that schools, including the proposed project by Clovis Unified, would not result in the inefficient, wasteful, or unnecessary consumption of energy. The project does not conflict with any Fresno General Plan policies related to renewable energy or energy efficiency.

7. Geology and Soils

The District retained AECOM to prepare a Geological/Environmental Hazards Report (AECOM 2018) for the proposed school site which is included as Appendix 4 to this Initial Study. The report was prepared following the requirements of California Education Code section 17212. This Initial Study uses information from the study to evaluate the proposed school project.

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- **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? Refer to Division of Mines and Geology Special Publication 42.**
- **Strong seismic ground shaking?**
- **Seismic-related ground failure, including liquefaction?**
- **Landslides?**
- **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?**
- **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?**

Less than Significant

The conclusions and recommendations of the AECOM study for geologic and soils conditions are as follows:

- The Project Site is not located within the boundaries of an Alquist-Priolo Earthquake Fault Zone, and no active faults are known to traverse the Project Site;

- Although the site is situated within an area of relatively low seismic activity, moderate ground shaking is considered possible at the site; however, this would be true for any potential school site within the school district boundaries;
- Based on the moderate ground shaking potential at the site, liquefaction is unlikely;
- The existing topography at the site does not provide sufficient relief to cause concern due to potential landslides. There are no topographic features of significant relief that could present a landslide hazard to the facility within several miles of the site.
- The site is located in an area with little or no subsidence;
- Based on the soil type mapped at the site, the risk of seismic settlement is considered negligible;
- The site is not located within an area of soils known to have moderately high-to-high expansion potential. Furthermore, the soil type mapped at the site does not appear likely to present an expansive soil hazard. Therefore, the risk of expansive soils at the site is considered negligible to low;

As a standard part of the school project design process, the District would retain a qualified consultant to prepare the design level Geotechnical Investigation Report. The design parameters identified in the analyses would be subject to review and approval by California Division of the State Architect, and the District would incorporate approved standards in the project design.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant

The potential for water-or wind-borne erosion and loss of topsoil would exist during the construction phase of the proposed project, primarily due to clearing, grubbing, and grading activities. Once construction is completed, the potential for erosion would be minimal because the ground would be covered by buildings, hard surfaces, and landscaping.

The project would be subject to requirements of the Central Valley Regional Water Quality Control Board and the San Joaquin Valley Air Pollution Control District. General Construction Permit, Order No. R5-2016-0040, issued by the State Water Quality Control Board in 2016, regulates construction projects of one acre or more, including the proposed project. Projects obtain coverage under the permit by developing and implementing the Storm Water Pollution Prevention Plans, which must specify best management practices that a project would employ to minimize pollution of storm water. Best management practices include erosion controls, sediment controls, wind erosion controls, non-storm water management controls, and waste management and controls (i.e. good housekeeping practices).

The intent of San Joaquin Valley Air Pollution Control District Regulation VIII (Fugitive PM10 Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM10) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. The regulation includes specific measures for construction projects.

c. Would the project 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?

No Impact

The project would connect to the City of Fresno sewer system. It would not involve the use of septic tanks or alternative wastewater disposal systems.

c. Would the project directly or indirectly destroy a unique paleontological resources or site or unique geological feature?

Less than Significant

There are no known unique paleontological resources or unique geological features on or near the site. See Sections E, 1, a-b, and E, 5, b.

8. Greenhouse Gas Emissions

A technical analysis of greenhouse gas emissions (Ambient 2018a) was conducted for the project and is included as Appendix 1 to this Initial Study. This Initial Study uses information from the analysis to evaluate the proposed school project.

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant

Implementation of the proposed project would contribute to increases of GHG emissions that are associated with global climate change. Short-term and long-term GHG emissions associated with the development of the proposed project are discussed in greater detail, as follows:

Short-term Greenhouse Gas Emissions

Short-term annual GHG emissions are summarized in Ambient 2018a, Table 10. Based on the modeling conducted, annual emissions of GHGs associated with construction of the proposed project would total approximately 644 $MTCO_{2e}$. There would also be a small amount of GHG emissions from waste generated during construction; however, this amount is speculative. Actual emissions would vary, depending on various factors including construction schedules, equipment required, and activities conducted. Assuming an average project life of 30 years, amortized construction-generated GHG emissions would total approximately 21.5 $MTCO_{2e}$/yr. Amortized construction-generated GHG emissions were included in the operational GHG emissions inventory for the evaluation of project-generated GHG emissions (refer to Ambient 2018a, Table 11).

Long-term Greenhouse Gas Emissions

Estimated long-term increases in GHG emissions associated with the proposed project are summarized in Ambient 2018a, Table 11. Based on the modeling conducted, operational GHG emissions would total approximately 1,678.2 $MTCO_{2e}$/year in 2020 and approximately 1,395.1 $MTCO_{2e}$/year in 2030. With the inclusion of amortized construction emissions, operational GHG emissions would total approximately 1,699.7 $MTCO_{2e}$/year in 2020 and approximately 1,416.6 $MTCO_{2e}$/year in 2030. Based on this estimate and assuming a population of 750 students and 50 employees, the calculated GHG efficiency for the proposed project would be 2.1 $MTCO_{2e}$/SP/yr in 2020 and 1.8 $MTCO_{2e}$/SP/yr in 2020. The GHG efficiency for the proposed project would not exceed the thresholds of 4.9 $MTCO_{2e}$/SP/yr in 2020 or 2.6 $MTCO_{2e}$/SP/yr in 2030.

As depicted in Ambient 2018a, Table 11, operational GHG emissions associated with the proposed project would be predominantly associated with mobile sources. With the implementation of a Safe Routes to School (SRTS) program, mobile-source emissions would be reduced by approximately 6.5 percent, which would result in additional reductions in overall operational GHG emissions (SRTSNP 2015). With implementation of a SRTS program, the calculated GHG efficiency for the proposed project would be 2.0 $MTCO_{2e}$/SP/yr in 2020 and 1.7 $MTCO_{2e}$/SP/yr in 2030.

It is also important to note that mobile-source emissions were conservatively calculated, based on the default fleet distribution assumptions contained in the model, which includes medium and heavy-duty vehicles. Mobile sources associated with schools typically consist largely to light-duty vehicles and buses. As a result, actual mobile-source emissions would be less. Nonetheless, because the GHG efficiency for the proposed project would not exceed the efficiency thresholds of 4.9 $MTCO_{2e}$/SP/yr in 2020 or 2.6 $MTCO_{2e}$/SP/yr in 2030, this impact would be considered less than significant.

b. Would the project conflict with any applicable plan, policy, or regulation of an agency adopted to reduce the emissions of greenhouse gases?

Less than Significant

As noted in E, 8, a, the proposed project would not result in increased GHG emissions that would conflict with AB 32 GHG-reduction targets. The proposed project would be designed to meet current building

energy-efficiency standards, which includes measures to reduce overall energy use, water use, and waste generation. The project would also be designed to promote the use of alternative means of transportation, such as bicycle use, and to provide improved pedestrian access that would link the project site to nearby land uses. These improvements would help to further reduce the project's GHG emissions and would also help to reduce community-wide GHG emissions. For these reasons, the proposed project would not conflict with local or state GHG-reduction planning efforts.

9. Hazards and Hazardous Materials

a. Would the project:

- **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**
- **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?**

Less than Significant

Construction of the project would involve the transport and use of fuels, lubricants, greases, solvents, and architectural coatings including paints.

Operation of the project would involve hazardous materials used for cleaning and maintenance purposes: cleansers, solvents, paints, pesticides, and fertilizers.

The school would be subject to state and local regulations governing the routine transport, use, and disposal of hazardous materials and the release of hazardous materials into the environment.

In addition, the California Education Code requires that the proposed school site undergo an environmental review process overseen by the California Department of Toxic Substances Control (DTSC). The purpose of the process is to determine if a release or threatened release of any hazardous materials found on the proposed site or presence of any naturally occurring hazardous materials on the site present a risk to human health or the environment. The District, working with DTSC, must identify and implement measures that would mitigate any hazardous conditions before the California Department of Education would approve the school site and provide funding for the project. (Education Code sections 17213.1, and 17213.2)

b. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant

The proposed project involves the construction and operation of a school and athletic facilities; no other existing or proposed schools are within one-quarter mile of the project. The potential for the project to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste is addressed in Section E, 9, a, and was determined to be *less than significant*.

c. Would the project be located on a site that 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?

No Impact

A review of the California Department of Toxic Substances Control's EnviroStor web site did not result in the identification of any hazardous materials sites within the project site.

d. 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, would the project result in a safety hazard for people residing or working in the project area?

Less than Significant

The nearest airport in the project vicinity is the Fresno Yosemite International Airport, which is located approximately one mile west of the project site. No private airstrips were identified within two miles of the project site. In accordance with Education Code section 17215, Caltrans Division of Aeronautics has evaluated the site with respect to safety and does not object to establishing the elementary school at the proposed location (Department of Transportation, February 12, 2018).

e. Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Less than Significant

All schools have emergency response/evacuation plans. Fresno County's Public Health Emergency Preparedness (PHEP) is responsible for developing response plans to be used in the event of a large-scale threat to the health of residents of Fresno County. However, research conducted for this Initial Study did not identify any adopted emergency response plans or emergency evacuation plans the project could impair.

f. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Less than Significant

The project site is not within or near a moderate, high, or very high fire hazard severity zone in a Local Responsibility Area (LRA) or State Responsibility Area (SRA) (Cal Fire 2007), therefore the risk of wildland fires would be considered low.

g. CEQA Guidelines section 15186, Public Resources Code section 21151.8, Education Code Section 17213, and California Code of Regulations, Title 5, Section 14011[h], establish requirements for evaluating the safety of potential school sites. The purpose of the requirements is to ensure that potential health hazards resulting from exposure to any hazardous materials, wastes, and substances that may exist on a site will be carefully examined and disclosed in a negative declaration or EIR, and that the lead agency will consult with other agencies in this regard. The EIR or negative declaration must address the following concerns under the aforementioned sections:

Is the proposed school site:

- **The site of a current or former hazardous waste or solid waste disposal facility and, if so, have the wastes have been removed;**
- **A hazardous substance release site identified by the Department of Toxic Substances Control in a current list adopted pursuant to Section 25356 of the Health and Safety Code for removal or remedial action pursuant to Chapter 6.8 (commencing with Section 25300) of Division 20 of the Health and Safety Code;**
- **The site of one or more buried or above ground pipelines that carry hazardous substances, acutely hazardous materials, or hazardous wastes, as defined in Division 20 of the Health and Safety Code? This does not include a natural gas pipeline used only to supply the school or neighborhood; and**
- **Within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor.**

In addition to addressing the preceding questions, Clovis Unified must determine if any permitted or non-permitted facilities, including but not limited to freeways and busy traffic corridors, large agricultural operations, and rail yards, are within one-fourth mile of the proposed school site that might reasonably be anticipated to emit hazardous emissions or handle hazardous or acutely hazardous material, substances, or waste.

As part of the Geological/Environmental Hazards Report (Appendix 4), AECOM conducted surveys for hazardous pipelines, electrical power lines, air toxics sources, aboveground storage tanks, and railroad tracks at the site and out to the respective radii from the site boundaries that are established for these various potential hazards in the California Education Code and/or in the CDE regulations or guidance

documents. The following section uses information from the Report to evaluate the proposed school project.

Less than Significant

Hazardous Pipeline Survey

AECOM contacted the State Fire Marshal (SFM), the local natural-gas service provider (Pacific Gas and Electric Company [PG&E]), and Fresno Irrigation District (FID) regarding whether hazardous pipelines or high-volume water supply pipelines, as defined by CDE, are located within 1,500 feet of the site (see documentation in AECOM 2018, Appendix C). AECOM also reviewed maps of oil/gas/geothermal fields prepared by the California Division of Oil, Gas & Geothermal Resources (DOGGR), and conducted a field survey for pipeline markers visible at or from the site or from road rights-of-way within 1,500 feet of the site. AECOM found that:

- There are no pipelines jurisdictional to the SFM within 1,500 feet of the site.
- PG&E has no natural gas transmission pipelines within 1,500 feet of the site.
- FID knows of one irrigation water pipeline of 12-inches or greater in diameter that are within 1,500 feet of the site:
    - FID's Temperance No. 37 pipeline runs south of Mill Ditch along the west side of Fowler Avenue. Based on the vicinity topography, it does not appear that leakage from this pipeline is likely to cause significant flooding at the site.
- The site is not mapped as being within an oil, gas or geothermal field, so there was no need to contact DOGGR regarding potential pipelines.
- No pipeline markers were observed within 1,500 feet of the site.

FID's Temperance No. 37 pipeline is not expected to result in a safety or flooding hazard to the school site. The pipeline is located south of Mill Ditch, downgradient from the school site and potential flood water from a broken pipeline would flow away from the site and be blocked from the site by the intervening Mill Ditch.

Electrical Powerline Survey

AECOM contacted the local electrical service provider (PG&E) regarding whether overhead electrical powerlines rated for greater than 50 kilovolts (kv) are located within 350 feet of the site (see documentation in AECOM 2018, Appendix C). AECOM also conducted a field survey for such powerlines visible at or from the site or from road rights-of-way within 350 feet of the site. AECOM found that:

- There are no PG&E overhead electrical transmission powerlines rated for greater than 50 kv within 350 feet of the site.
- No electrical powerlines were observed within 350 feet of the site, other than distribution powerlines, which are typically rated at 21 kv or less.

Hazardous Air Emissions/Hazardous Materials Survey

AECOM contacted the Fresno County Environmental Health Division (FCEHD) and the San Joaquin Valley Air Pollution Control District (SJVAPCD) regarding whether there are facilities that may produce hazardous air emissions and/or handle hazardous materials within ¼ mile of the site (see documentation in AECOM 2018, Appendix C). AECOM also conducted a field survey for such facilities within ¼ mile of the site that are visible at or from the site or from road rights-of-way. AECOM found that:

- The FCEHD found no such facilities located within ¼ mile of the site.
- The SJVAPCD reported no permitted facilities located within ¼ mile of the site.

Aboveground Storage Tanks Survey

AECOM contacted FID regarding whether there are aboveground fuel or water storage tanks located within ¼ mile of the site (see documentation in AECOM 2018, Appendix C). AECOM also reviewed a 2016 aerial

photograph and conducted a field survey for such storage tanks visible at or from the site or from road rights-of-way within ¼ mile of the site. AECOM found that:

- FID has no such storage tanks within ¼ mile of the site.
- Aboveground propane tanks are likely present at residences that are within ¼ mile of the site. The nearest propane tank appears to be at a house located more than 400 feet north of the site.

These typical residential-type storage tanks would not constitute a significant safety hazard to the school site. A recent study of residential propane storage tanks within 100 feet of another proposed Clovis Unified school site near Locan and Shields Avenue, determined that two tanks located within 85 and 130 feet of the school site would not pose a significant safety hazard to the site (J. House Environmental, September 13, 2018). Given that the nearest tank is as least 400 feet from the Fowler-McKinley school site, no significant safety hazard is anticipated.

Railroad Track Survey

AECOM reviewed a 2014 aerial photograph and a 1981 USGS topographic map and conducted a field survey for railroad tracks located within 1,500 feet of the site. AECOM found that railroad tracks were mapped previously immediately south of Mill Ditch, but the tracks are no longer present.

10. Hydrology and Water Quality

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant

The City of Fresno's water supply system complies with applicable water quality standards and the City's wastewater discharge system complies with applicable waste discharge requirements. The design and operational characteristics of the project related to water and wastewater would not incrementally or directly cause the City's systems to violate the applicable requirements.

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

Less than Significant

The City of Fresno obtains its water supply from groundwater from the Kings Sub-basin and surface water from the San Joaquin River and Kings River. The Kings Sub-basin is substantially overdrafted. The Sustainable Groundwater Management Act (SGMA) was signed into law in 2014 to remedy unsustainable groundwater depletion in groundwater basins in California. SGMA requires the development and adoption of Groundwater Sustainability Plans (GSPs) by 2020 and that all high and medium priority groundwater basins must reach sustainability by 2040. The City of Fresno is a member of the North Kings Groundwater Sustainability Agency, which is in the process of developing a GSP. The City of Fresno's 2016 Urban Water Management Plan illustrates the City's goals to achieve a 'water balance' between supply and demand while decreasing reliance upon and use of groundwater. The City of Fresno has adopted a key objective of balancing its groundwater operations by 2025.To achieve these goals the City is implementing a host of strategies, including increasing intentional groundwater recharge at a number of locations, increasing the use of existing surface water entitlements and a new Southeast Storm Water Treatment Facility and the recycling of wastewater at the Fresno-Clovis Regional Wastewater Reclamation Facility. The project site is within the City of Fresno Growth Area 1 and according to Fresno Irrigation District, is entitled to water under the current City of Fresno Conveyance Agreement. This area has been planned for urban development for a long time, and water demand has been anticipated in the City's long-term water planning. Furthermore, the project would use substantially less water than the existing General Plan land use designations for the project site (see Section E, 19, a, Tables E-19-1 and 2). For the above reasons, the project would have a less than significant impact on groundwater supplies.

The proposed project would reduce the amount of land available for groundwater recharge by covering existing agricultural land with impermeable road, building, and hardcourt surfaces. However, most of the project site will consist of permeable turfed playground and athletic fields areas that would allow groundwater recharge. Furthermore, storm drainage from the project site will drain to a ponding basin where water would percolate into the ground. Therefore, the project would not interfere substantially with groundwater recharge.

c. Would the project 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 that would

- **Result in substantial erosion or siltation on- or off-site;**
- **Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site;**
- **Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**
- **Impede or redirect flood flows**

Less than Significant

No streams or rivers exist on the project site.

Grading required for the proposed project would change the existing drainage pattern within the project site, and the additional covered surfaces would increase the amount of surface runoff and, potentially, the rate of runoff. The runoff would have the potential to degrade surface and groundwater quality if not properly controlled.

The Fresno Metropolitan Flood Control District (FMFCD) is responsible for managing urban stormwater runoff within the Fresno area. The site is within FMFCD Drainage Area "BS" and will be served by an existing pipeline that runs along Fowler Avenue. The District will enter into an agreement with FMFCD that will include Items 2a through 2c in FMFCD's letter, dated March 27, 2018, and incorporated by reference in this Initial Study. The FMFCD letter indicates that "future [FMFCD] storm drainage facilities will have capacity to serve the density of the project."

Before beginning construction, Clovis Unified must prepare a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP is a site-specific plan that is designed to control the discharge of pollutants from the construction site to local storm drains and waterways.

Based on the above, the project's impacts related to increased surface runoff and potential polluted runoff are less than significant.

d. Would the project result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to inundation?

Less than Significant

Based on the site's distance from the ocean, tsunami hazards at the site are not considered possible.

No large bodies of water have been identified within approximately 15 miles of the site. Therefore, seiche hazards at the site are not considered possible.

Major flooding is not expected at the site, but sheet overland flow and pooling in low areas is probable during heavy or prolonged storms.

According to DWR records, there are 33 dams located within Fresno County [Fresno County, 2000]. Of these, four major dams could cause substantial flooding in Fresno County in the event of a failure: Friant Dam, Big Dry Creek Dam, Redbank-Fancher Creek Project Dams, and Pine Flat Dam. Failure of these dams is considered a very unlikely event. The site is located outside the flood inundation areas in the event of failure of these dams.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant

The project site is subject to the Water Quality Control Plan for the San Joaquin River Basins. As such, this project will comply with applicable policies and standards.

The Sustainable Groundwater Management Act of 2014 (SGMA) requires the formation of local Groundwater Sustainability Agencies (GSAs) who are responsible for developing Groundwater Sustainability Plans (GSPs). The project site is located within jurisdiction of the North Kings Groundwater Sustainability Agency. This new agency has not yet developed a GSP. It is noted that this Initial study has concluded that the project would have a less than significant impact on groundwater supplies (Section E, 10, b)

11. Land Use and Planning

a. Would the project physically divide an established community?

Less than Significant

The location and scale of the proposed school would not physically divide the City of Fresno because the project site is located on the periphery of urban development. Elementary, middle, and high schools are usually located in residential neighborhoods and often serve as unifying elements for the neighborhoods.

b. Would the project 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?

Less than Significant

Schools and related improvements and activities are typically considered to be an appropriate and necessary land use component of a well-balanced neighborhood and community. The Fresno General Plan designates the school site for Public Facility/Elementary School use and adjacent areas to the east and northeast for Medium Density Residential development. Land to the north and east of the project site has been approved by the City of Fresno as a single family residential subdivision (Tentative Tract No. 6214), which will likely be constructed prior to the school.

12. Mineral Resources

Would the project:

- **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?**
- **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?**

No Impacts

The project would not result in the loss of availability of a known mineral resource because no known resources exist on or near the proposed school site. Likewise, the project would not result in the loss of availability of a locally important mineral resource recovery site because none exists on or near the proposed school site. (City of Fresno General Plan EIR 2014).

13. Noise

This section is based on Noise Impact Analysis (Ambient 2018b) prepared for the project which is included as Appendix 6 to this Initial Study.

a. Would the project result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant with Mitigation

The Fresno County General Plan Noise Element includes noise standards for determination of land use compatibility for new land uses. As previously discussed, the County's "normally acceptable" exterior noise standards for schools is 65 dBA CNEL/L_{dn}.

As noted earlier in this report, ambient noise levels in the project area are largely influenced by traffic noise emanating from Fowler Avenue. Under future cumulative conditions, with project-generated vehicle traffic included, the predicted 65 dBA CNEL/L_{dn} noise contours for Fowler Avenue and the future McKinley Avenue extension would extend to approximately 182 and 75 feet, respectively, from the roadway centerline. The location of on-site structures has not yet been determined. As a result, it is conceivable that on-site structures could be located within the projected future 65 dBA CNEL contours of these nearest roadways. Predicted exterior noise levels at onsite structures could, therefore, potentially exceed the County's "normally acceptable" exterior noise standard of 65 dBA CNEL/L_{dn}. In addition, depending on the location of onsite structures, predicted interior traffic noise levels could potentially exceed the commonly applied interior noise standard of 45 dBA CNEL/L_{dn}. This impact is considered potentially significant.

Mitigation Measure N-1: The following measures shall be implemented to reduce long-term on-site operational noise impacts:

- Structures to be used for education instruction purposes shall not be located closer than 182 feet of the centerline of Fowler Avenue or 75 from the centerline of McKinley Avenue.

With implementation of the above mitigation measure, on-site structures would not be located within the projected future 65 dBA CNEL contours of the adjacent roadways. Assuming an average exterior-to-interior noise reduction of 25 dBA, which is typical for new building construction, predicted interior noise levels would be approximately 40 dBA CNEL, or less. With mitigation, predicted on-site noise levels at educational-use facilities would not exceed the County's "normally acceptable" exterior noise standard of 65 dBA CNEL/L_{dn}, nor the commonly applied interior noise standard of 45 dBA CNEL/L_{dn}.

b. Would the project result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant

Long-term operational activities associated with the proposed project would not involve the use of any equipment or processes that would result in potentially significant levels of ground vibration. Increases in groundborne vibration levels attributable to the proposed project would be primarily associated with short-term construction-related activities. Construction activities associated with the proposed improvements would likely require the use of various off-road equipment, such as tractors, concrete mixers, and haul trucks. The use of major groundborne vibration-generating construction equipment, such as pile drivers, would not be required for this project.

Groundborne vibration levels associated with representative construction equipment are summarized in Ambient 2018b, Table 8. As depicted, ground vibration generated by construction equipment would be approximately 0.08 in/sec ppv, or less, at 25 feet. Predicted vibration levels at the nearest existing structures would not exceed the minimum recommended criteria for structural damage and human annoyance (0.2 in/sec ppv, respectively).

c. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than Significant with Mitigation

Long-term increases in ambient noise levels associated with the proposed project would be associated with increases in vehicle traffic along area roadways. To a lesser extent, on-site non-transportation noise sources

would also contribute to potential increases in ambient noise levels. Noise levels associated with project-generated traffic and non-transportation sources are discussed below.

Roadway Traffic

Predicted existing traffic noise levels, with and without implementation of proposed project, are summarized in Ambient 2018b, Table 9. In comparison to existing traffic noise levels, the proposed project would result in a predicted increase in traffic noise levels of approximately 0.1 to 1.3 dBA.

Predicted increases in future cumulative traffic noise levels along nearby roadways for proposed project are summarized in Ambient 2018b, Table 10. In future years, the project's contribution to cumulative traffic noise levels would be anticipated to decline as increases in vehicle traffic due to surrounding development increases. Under future cumulative conditions, the proposed project would result in predicted increases in traffic noise levels of approximately 0.1 to 1.4 dBA.

As noted earlier in this report, changes in ambient noise levels of approximately 3 dBA, or less, are typically not discernible to the human ear and would not be considered to result in a significant impact. Implementation of the proposed project would not result in a significant increase in traffic noise levels along area roadways. Other less-affected area roadways would, likewise, not experience a significant increase in traffic noise levels. Project-generated increases in traffic noise levels would be considered to have a less-than-significant impact.

Mechanical Building Equipment

The proposed project would include the construction of new buildings, primarily within the southeastern portion of the project site (refer to Ambient 2018b, Figure 2). Mechanical building equipment (e.g., heating, ventilation and air conditioning systems) can result in noise levels of approximately 90 dBA at 3 feet from the source. However, mechanical equipment systems are typically shielded from direct public exposure and housed on rooftops, within equipment rooms, or within exterior enclosures.

Based on preliminary site plans prepared for the project, the nearest existing residential land use is located approximately 350 feet from the project site. Based on this distance and assuming an uninterrupted noise level of 90 dBA L_{eq} at 3 feet, predicted operational noise levels associated with on-site building mechanical equipment would approximately 48 dBA L_{eq} at this nearest residence. Operational noise levels would be limited primarily to the daytime hours of school operations and would be intermittent. Given that building mechanical equipment is typically shielded from direct public exposure and placed on rooftops, actual noise levels would likely be substantially less. Based on preliminary site plans prepared for the project, operational noise levels for building mechanical equipment would not exceed the City/County of Fresno's daytime noise standard of 50 dBA L_{eq}. However, depending on final site design and building locations, predicted noise levels associated with building mechanical equipment could potentially exceed applicable noise standards.

It is also important to note that residential land uses are planned to be constructed along the northern and eastern project site boundaries. These future residential land uses would be located within the City of Fresno. Depending on final site design and building locations, predicted noise levels associated with building mechanical equipment could potentially exceed the City's daytime noise standard of 50 dBA L_{eq}. As a result, the operation of building mechanical equipment would be considered to have a potentially significant impact to nearby existing and planned future residential land uses.

Exterior Recreational-Use Facilities

The proposed project would likely include the construction of on-site recreational uses, such as ball fields and ball courts. Based on noise measurements conducted for similar projects, average-hourly noise levels associated with elementary school recreational-use facilities, including ball fields and ball courts, typically average 60 dBA L_{eq}, or less, at the field edge and at approximately 50 feet from spectator areas. Intermittent noise events typically associated with such uses include individuals yelling and the intermittent sound of the hitting and bouncing of balls. Major competitive events involving large spectator crowds and the use of amplified sound/public address (PA) systems are typically not associated with elementary school facilities.

Based on preliminary site plans prepared for the proposed project, the nearest existing residential land use is located approximately 350 feet from the project site. Based on this distance and assuming an uninterrupted noise level of 60 dBA L_{eq} at 50 feet from the site boundary, predicted noise levels associated with on-site recreational uses would be approximately 43 dBA L_{eq} at the nearest residential land use. Operational noise levels would be limited primarily to the daytime hours of school operations and would be intermittent. Assuming that recreational activities were to occur continuously during the daytime hours, predicted average-daily noise levels at the nearest residential land use would be approximately 41 dBA CNEL, or less. Operational noise levels for on-site recreational uses would not exceed the City of Fresno's average-daily noise standard of 60 dBA CNEL. However, depending on final site design and the location of onsite recreational uses, predicted noise levels associated with onsite recreational uses could potentially exceed applicable noise standards.

It is also important to note that residential land uses are planned to be constructed along the northern and eastern project site boundaries. These future residential land uses would be located within the City of Fresno. Depending on final site design and the location of onsite recreational uses, predicted noise levels associated with onsite recreational uses could potentially exceed the City's average-daily noise standard of 60 dBA CNEL. As a result, onsite recreational uses would be considered to have a potentially significant impact to nearby existing and future planned residential land uses.

On-site Vehicle Parking Areas

Noise levels commonly associated with parking lots are generated by the starting of vehicles, the opening and closing of vehicle doors, playing of amplified music, and the occasional sound of vehicle alarms and horns. Intermittent noise levels associated with such noise events can generate sound levels of up to approximately 92 dBA at 50 feet. Overall, average-hourly noise levels associated with parking lots are largely dependent on vehicle activity and, thus, would likely be greatest during the hours preceding or upon conclusion of school operations.

Based on a similar-sized elementary school site, the proposed project is anticipated to require approximately 125 on-site parking spaces. Assuming that all proposed vehicle parking spaces would be accessed within a one-hour period, the highest daytime hourly noise levels associated with on-site parking activities would be approximately 56 dBA L_{eq} at 50 feet. Based on this noise level and assuming that on-site parking facilities were to be located along the western property line, the highest predicted operational noise levels at the nearest residential land use would be approximately 35 dBA L_{eq}. Based on the preliminary site plans prepared for the proposed project, predicted noise levels associated with on-site vehicle parking areas would not exceed the City/County of Fresno's daytime noise standard of 50 dBA L_{eq}. However, depending on final site design, predicted noise levels associated with onsite parking areas could potentially exceed applicable noise standards and nearby existing and/or planned future residential land uses. As a result, this impact is considered potentially significant.

Facility Maintenance

Exterior noise events associated with the maintenance of school facilities are typically associated with the operation of landscape maintenance equipment, as well as, occasional waste-collection activities. Based on measurements conducted at similar facilities, landscape maintenance equipment, such as leaf blowers and gasoline-powered lawn mowers; as well as waste collection activities can result in intermittent noise levels of up to approximately 100 dBA at 3 feet (EPA 1971). Resultant exterior noise levels could reach intermittent levels of approximately 75 dBA at 50 feet. Based on this noise level and assuming that facility maintenance activities were to occur near the site boundary, predicted intermittent noise levels at the nearest residential land use would be approximately 58 dBA L_{max}. The hours during which landscape maintenance and waste collection activities would be conducted have not yet been specified, nor has the location of on-site waste-collection facilities been identified. In the event that landscape maintenance and waste collection activities were to occur during the more noise-sensitive nighttime hours, the intermittent noise levels associated with these activities could result in increased levels of annoyance and potential sleep disruption to occupants of nearby residential dwellings. As a result, increases in noise levels associated with facility maintenance activities would be considered potentially significant.

Mitigation Measure N-2: The following measures shall be implemented to reduce long-term operational noise impacts:

- An acoustical analysis shall be prepared for the proposed project prior to final design. The acoustical analysis shall identify noise-reduction measures to be incorporated sufficient to achieve an exterior average-hourly noise-level of 50 dBA Leq, or less, at the property line of the nearest noise-sensitive land use for on-site building mechanical equipment and vehicle parking areas. Onsite recreational uses shall be evaluated in comparison to the City of Fresno's average-daily noise standard of 60 dBA CNEL. Noise-reduction measures to be incorporated may include, but are not limited to, the selection of alternative or quieter equipment and construction of noise barriers (i.e., walls).
- Noise-generating maintenance activities, such as landscape maintenance and waste-collection activities, shall be limited to between the hours of 7:00 a.m. to 10:00 p.m.

Implementation of the above mitigation measures would limit on-site maintenance activities to the daytime hours of operation. Predicted noise levels associated with facility maintenance activities would not exceed the City of Fresno's daytime noise standards of 50 dBA Leq or 70 dBA L_{max}. As a result, increases in noise levels associated with facility maintenance activities would be considered less than significant.

d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than Significant with Mitigation

Construction noise typically occurs intermittently and varies depending upon the nature or phase (e.g., demolition/land clearing, grading and excavation, erection) of construction. Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Although noise ranges were found to be similar for all construction phases, the initial site preparation phase tended to involve the most equipment. As noted in Ambient 2018b, Table 12, noise levels generated by individual pieces of construction equipment typically range from approximately 74 dBA to 89 dBA L_{max} at 50 feet (FTA 2006). Typical operating cycles may involve 2 minutes of full power, followed by 3 or 4 minutes at lower settings. Average hourly noise levels at construction sites typically range from approximately 65 to 89 dBA L_{eq} at 50 feet, depending on the activities performed.

Based on the equipment noise levels presented in Ambient 2018b, Table 12 and assuming a noise attenuation rate of 6 dBA per doubling of distance from the source, exterior noise levels at nearby residences located within approximately 1,500 feet and within line-of-sight of construction activities could exceed 60 dBA without feasible noise control. Activities occurring during the more noise-sensitive nighttime hours would be of particular concern given the potential for increased levels of annoyance and sleep disruption to occupants of nearby residential dwellings.

The proposed project does not include hourly restrictions for construction activities. Typically, construction-related activities occurring during the nighttime hours (i.e., 10:00 p.m. to 7:00 a.m.) would not be exempt from noise ordinance requirements. As a result, given that construction activities could potentially occur during the more noise-sensitive periods of the day, noise-generating construction activities would be considered to have a potentially significant short-term noise impact.

Mitigation Measure N-3: The following measures shall be implemented to reduce construction-generated noise levels:

a. Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 10:00 p.m. Construction activities shall be prohibited on Sundays and legal holidays.

b. Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.

c. When not in use, all equipment shall be turned off and shall not be allowed to idle. Provide clear signage that posts this requirement for workers at the entrances to the site.

Use of mufflers would reduce individual equipment noise levels by approximately 10 dBA. Implementation of the above mitigation measures would limit construction activities to the less noise-sensitive periods of the day. With implementation of the above mitigation measures, this impact would be considered less than significant.

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, would the project expose people residing or working in the project area to excessive noise levels?

Even though the school site is outside the 60 dB CNEL noise contour, Caltrans has indicated in its evaluation of the school site pursuant to Education Code section 17215, that because the school site is close to the extended runway centerline, it may be exposed to aircraft noise events that could reach a level that could be disruptive. Therefore, Caltrans recommends that the school have air conditioning so that all windows and doors can remain closed; that acoustical treatment be included in the design and construction of the school buildings to reduce the effects of aircraft noise on the interior of the buildings; and that Clovis Unified grant an avigation easement to the City of Fresno (the owner and operator of the airport) that includes aircraft noise (Department of Transportation, February 12, 2018). Air conditioning is a given for school construction in the San Joaquin Valley and an avigation easement is not a CEQA issue, but the following mitigation measure is included in the project to address aircraft noise:

Mitigation Measure N-4: The architect hired to design the school buildings, with the assistance of an acoustical consultant, shall evaluate the potential for aircraft noise to adversely affect educational activities on the site and shall include acoustical treatment in the design and construction of the buildings should the proposed building design not be adequate to minimize disruption due to aircraft noise.

14. Population and Housing

a. Would the project induce substantial unplanned population growth either in an area, directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less than Significant

School facilities are planned and built as a result of new urban development creating a demand for the schools. Without urban development, new schools would generally not be needed (except in cases where demographic or economic changes in existing urban areas create a need for additional school facilities). However, the act of building a planned new school needed to serve existing and/or planned urban development can make it more desirable to live in an area and in some cases can extend infrastructure that can serve as an impetus for new growth. The project involves the extension of roads and the water and sewer infrastructure necessary to serve the project; however, Clovis Unified is proposing the project in response to recently constructed and planned new residential development in the City of Fresno, which has already been evaluated under the Fresno General Plan EIR. The project would not have a growth inducing effect for any new development that was not already planned and anticipated by the City.

b. Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact

The proposed school site will not displace substantial numbers existing housing, nor require the construction of replacement housing elsewhere.

15. Public Services

a. Would the project result in substantial adverse physical impacts associated with the provision of new or altered governmental facilities, need for new or 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: fire protection, police protection, schools, parks, and other public facilities?

Less than Significant

The project would not result in the need for new or physically altered fire protection, police protection, parks, other public facilities in order to maintain acceptable service ratios, response times or other performance objectives. The project site is within two miles of Fresno Fire Station No. 10. The project site will be located within the Southeast Police District, approximately 7 miles from the Southeast District Police Station. Neither the City of Fresno or County of Fresno law enforcement agencies indicated concern regarding the project. It is noted that Clovis Unified has its own police department. The project would not adversely affect park facilities and, as noted in Section E, 16, a, below, would add to the grounds and facilities within the community that Clovis Unified could make available to the community for recreational and other uses.

16. Recreation

a. Would the project 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?

No Impact

The project would not increase the demand for or use of existing park and recreation facilities. Instead, the proposed schools would add to the grounds and facilities within the community that Clovis Unified could make available to the community for recreational and other uses.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Less than Significant

The proposed school would include recreational facilities for physical education purposes. This Initial Study addresses impacts associated with the development of the facilities as an integral part of the evaluation of impacts in Sections E, 1-19.

17. Transportation

The discussion of transportation and traffic impacts in this section primarily reflects information in the Traffic Impact Analysis (TIA) prepared for the project by JLB Traffic Engineering, Inc. (JLB 2018), which is included as Appendix 6 to this Initial Study (Note: Table E-17-1 provides definitions for traffic-related terms used in this section.)

TABLE E-17-1
Transportation/Traffic Definitions and Standards

Roadway Categories
• Expressways: Expressways provide for through traffic movement on continuous routes through a city. It generally connects with arterials, highways, freeways. Also, it connects a city with other cities. Expressways are generally four lane roadways, divided and undivided. Access to expressways is typically restricted to signalized intersections with arterial and collector streets. There are no expressways in the vicinity of this project.
• Arterials: Arterials are designed to move large volumes of traffic and are intended to provide a high level of mobility between freeways, expressways, other arterials, and collector roadways. Arterials also provide non-freeway/highway connections between major residential, employment, and activity centers. Unlike freeways, they are intended not only for motor vehicles, but also for bicycles and pedestrians. Arterial streets typically have more right-of-way and a higher degree of access control than collector roadways.

- Collectors: Collector streets provide for relatively short distance travel between and within neighborhoods. Collectors are not designed to handle long-distance through-traffic. Driveway access to collectors is less limited than on arterials. Speed limits on these streets are typically lower than those found on arterials.
- Local Streets: Local streets are designed to provide direct roadway access to abutting land uses and serve short distance trips within neighborhoods. Traffic volumes and speed limits on local streets are low, and these roadways have no more than two travel lanes.

Level of Service

The Level of Service (LOS) is the primary measure of roadway performance. LOS is a qualitative description of traffic flow from the perspective of motorists. The Highway Capacity Manual (HCM) developed by the Transportation Research Board defines the following six levels of service from LOS A to LOS F. These grades represent the perspective of drivers only and are an indication of the comfort and convenience associated with driving, as well as speed, travel time, traffic interruptions, and freedom to maneuver.

- Level of Service A: Free-flow operations. Drivers are almost completely unimpeded in their ability to maneuver within the traffic stream.
- Level of Service B: Free-flow speeds are maintained. The ability to maneuver within the traffic stream is only slightly restricted.
- Level of Service C: Traffic flow with speeds at or near free-flow speed. The freedom to maneuver within the traffic steam is noticeably restricted, and lane changes require more care and vigilance on the part of the driver.
- Level of Service D: Speeds begin to decline slightly with increasing flows. Freedom to maneuver within the traffic stream is noticeably limited.
- Level of Service E: Operations at or near capacity. There are virtually no useable gaps within the traffic stream, leaving little room to maneuver.
- Level of Service F: Breakdown in vehicular flow. Vehicular demand exceeds capacity. (Fehr and Peers 2014)

AM Peak Hour/PM Peak Hour

For purposes of this Initial Study,

- AM Peak Hour (or morning peak hour) means the average vehicle trip ends versus dwelling units for residential units and students for elementary schools on a weekday (Tuesday, Wednesday or Thursday only), peak hour of adjacent street traffic, one hour between 7 and 9 a.m.
- PM Peak Hour (or evening peak hour) means the average vehicle trip ends versus dwelling units for residential units and students for elementary schools on a weekday (Tuesday, Wednesday or Thursday only), peak hour of adjacent street traffic, one hour between 2 and 4 p.m.

a. Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less than Significant with Mitigation

Criteria of Significance

The 2035 City of Fresno General Plan has established various degrees of acceptable LOS on its major streets, which are dependent on four (4) Traffic Impact Zones (TIZ) within the City. The standard LOS threshold for TIZ I is LOS F, that for TIZ II is LOS E, that for TIZ III is LOS D, and that for TIZ IV is LOS E. Additionally, the 2035 MEIR made findings of overriding consideration to allow a lower LOS threshold than that established by the underlying TIZs. For those cases in which a LOS criterion for a roadway segment differs from that of the underlying TIZ, such criteria are identified in the roadway description. Pursuant to the City of Fresno 2035 General Plan, LOS D is used to evaluate the potential significance of LOS impacts to intersections and segments within this TIA.

The County of Fresno has established LOS C as the acceptable level of traffic congestion on county roads and streets that fall entirely outside the Sphere of Influence (SOI) of a City. For those areas that fall within the SOI of a City, the LOS criteria of the City are the criteria of significance used in this report. LOS C is used to evaluate the potential significance of LOS impacts to Fresno County intersections and segments, which fall outside the City of Fresno SOI. In this case, since all study facilities fall within the City of Fresno SOI, the City of Fresno LOS threshold is utilized.

Caltrans endeavors to maintain a target LOS at the transition between LOS C and D on State highway facilities consistent with the *Caltrans Guide for the Preparation of Traffic Impact Studies* dated December 2002. However, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. In this TIA, however, since all study facilities fall within the City of Fresno, the City of Fresno LOS thresholds are utilized.

Existing Traffic Conditions

Roadway Network

Clinton Avenue is an existing east-west two-lane, predominantly undivided collector adjacent to the proposed Project. In this area, Clinton Avenue is a two-lane undivided collector east of Clovis Avenue but is divided by a two-way left-turn lane for approximately 700 feet east of Clovis Avenue, 1,300 feet east of Fowler Avenue, and between Temperance Avenue and Locan Avenue. The City of Fresno 2035 General Plan Circulation Element designates Clinton Avenue as a four-lane collector between Clovis Avenue and Locan Avenue.

Fowler Avenue is an existing north-south two- to four-lane collector adjacent to the proposed Project. In this area, Fowler Avenue is a four-lane divided arterial north of Clinton Avenue, a two-lane undivided collector between Clinton Avenue and the State Route 180 Interchange, and a four-lane divided arterial south of the State Route 180 Interchange. Fowler Avenue extends south of the City of Clovis SOI and beyond the City of Fresno SOI. The City of Fresno 2035 General Plan Circulation Element designates Fowler Avenue as a four-lane divided arterial through the City of Fresno SOI. Furthermore, the City of Fresno 2035 General Plan Circulation Element acknowledged that Fowler Avenue would exceed LOS D as a four-lane facility between McKinley Avenue and Olive Avenue. However, City Council made the appropriate findings to designate LOS F as the criteria of significance for Fowler Avenue as a four-lane facility between McKinley Avenue and Olive Avenue.

McKinley Avenue is a planned future east-west two-lane collector adjacent to the proposed Project. McKinley Avenue exists as a four-lane divided arterial west of Clovis Avenue and a two-lane undivided arterial east of Temperance Avenue. In this area, McKinley Avenue will ultimately exist east of Fowler Avenue and extend northwest to connect to Sunnyside Avenue. The City of Fresno 2035 General Plan Circulation Element designates McKinley Avenue as a two-lane collector east of Sunnyside Avenue through the City of Fresno SOI.

Floradora Avenue is an existing east-west two-lane undivided local roadway in the vicinity of the proposed Project. In this area, Floradora Avenue extends between Fowler Avenue and Temperance Avenue. The City of Fresno 2035 General Plan Circulation Element designates Floradora Avenue as a local roadway throughout the City of Fresno.

Olive Avenue is an existing east-west two-lane collector in the vicinity of the proposed Project. In this area, Olive Avenue is an undivided collector west of Fowler Avenue and is divided by a two-way left-turn lane east of Fowler Avenue. This segment of Olive Avenue extends between the western limits of the City of Fresno SOI and Fancher Avenue in the City of Fresno. The City of Fresno 2035 General Plan Circulation Element designates Olive Avenue as a two-lane undivided collector between Grantland Avenue and Marks Avenue, a four-lane undivided collector between Marks Avenue and Fruit Avenue, a two-lane undivided collector between Fruit Avenue and Blackstone Avenue, a four-lane undivided collector between Blackstone Avenue and Temperance Avenue, and a two-lane undivided collector between Temperance Avenue and Fancher Avenue. The City of Fresno 2035 General Plan Circulation Element acknowledged that additional lanes would be necessary for Olive Avenue between Fulton Street and San Pablo Avenue by the

year 2035. However, City Council made the appropriate findings to designate LOS E as the criteria of significance for this segment of Olive Avenue as a two-lane facility.

State Route 180 is an existing east-west six-lane freeway in the vicinity of the proposed Project. State Route 180 connects southeast and southwest Fresno with Downtown Fresno and has freeway-to-freeway interchanges at State Route 41, State Route 99 and State Route 168. East of Fresno, State Route 180 also provides access to Kings Canyon and Sequoia National Parks, while west of Fresno, State Route 180 connects to the cities of Kerman and Mendota.

Transit

Fresno Area Express (FAX) is the transit operator in the City of Fresno. At present, there are no FAX transit routes that operate in the vicinity of the proposed Project. The closest is FAX Route 45, which runs on Princeton Avenue and Fowler Avenue, approximately 0.50 miles to the north of the proposed Project. Route 45 operates at 60-minute intervals on weekdays and weekends and its nearest stop to the Project site is located on the south side of Princeton Avenue approximately 150 feet west of Fowler Avenue. This route provides a direct connection to Palm Lakes Golf Course, Bullard High School, Gillis Library, Fresno High School, Fresno City College, Manchester Transit Center, Army Navy Reserve and the Shields/Fowler Industrial Park. Retention of the existing and expansion of future transit routes is dependent on transit ridership demand and available funding.

Bikeways

Currently, bike lanes exist in the vicinity of the proposed Project site along Clinton Avenue and Fowler Avenue. The City of Fresno "Bicycle, Pedestrian & Trails Master Plan" recommends that Class II Bike Lanes be implemented on: 1) Clinton Avenue between Clovis Avenue and Locan Avenue, 2) Fowler Avenue south of Clinton Avenue, and 3) Olive Avenue between the western limits of the City of Fresno SOI and Fancher Avenue in the City of Fresno. The City of Fresno "Bicycle, Pedestrian & Trails Master Plan" also recommends that a Class I Bike Path be implemented along the canal bank adjacent to the McKinley Avenue alignment east of Clovis Avenue. Therefore, it is recommended that the Project implement a Class II Bike Lane along its frontage to Fowler Avenue.

Walkways

Because schools attract pedestrian activity, it is at times recommended that a warrant analysis for hybrid beacons across the major streets between the residential areas and the schools be conducted. In this case, the area west of Fowler Avenue within the anticipated Project's attendance area boundary is zoned industrial and, as a result, little to no pedestrian activity is anticipated to cross Fowler Avenue adjacent to the Project. Additionally, to the south of the Project along the south side of the future McKinley Avenue runs an irrigation canal that will remain. Hence, this existing canal will act as a barrier, preventing pedestrian activity across McKinley Avenue. Also, to the east of the Project, residential development and local streets will border the Project up to the Project's anticipated eastern boundary located along the west side of Armstrong Avenue. Similarly, to the north of the Project, residential development, local streets and Clinton Avenue, a collector street, will surround the area. It is likely that some of the school children that live in the areas north of Clinton Avenue between Fowler Avenue and Armstrong Avenue will walk across Clinton Avenue and subsequently utilize the local streets planned as part of tract map 6214 to reach the Project. Therefore, it is recommended that the Project conduct a warrant analysis for a hybrid beacon across Clinton Avenue at the future Laverne Avenue intersection prior to construction of the Project.

Study Facilities

The existing peak hour turning movement and segment volume counts were conducted at the study intersections and segments in January, February and April 2018 while schools in the vicinity of the proposed Project were in session. The intersection turning movement counts included pedestrian volumes. The traffic counts for the existing study intersections and segments are contained in JLB 2018 Appendix B.

Intersections

1. Clinton Avenue / Fowler Avenue
2. Kerry Avenue (future) / Fowler Avenue

3. McKinley Avenue (future) / Fowler Avenue
4. Floradora Avenue / Fowler Avenue
5. Olive Avenue / Fowler Avenue

Segments

1. Clinton Avenue between Clovis Avenue and Fowler Avenue
2. Clinton Avenue between Fowler Avenue and Armstrong Avenue
3. McKinley Avenue (future) between Fowler Avenue and Armstrong Avenue

Project Only Trips to State Facilities

1. State Route 180 / Fowler Avenue

Study Scenarios

Existing Traffic Conditions

This scenario evaluates the Existing Traffic Conditions based on existing traffic volumes and roadway conditions from traffic counts and field surveys conducted in the year 2018.

Existing plus Project Traffic Conditions

This scenario evaluates total traffic volumes and roadway conditions based on the Existing plus Project Traffic Conditions. The Existing plus Project traffic volumes were obtained by adding the 2018 Project Only Trips to the Existing Traffic Conditions scenario. The 2018 Project Only Trips to the study intersections were based on the anticipated school boundary, existing travel patterns, the existing roadway network, engineering judgment, residential and commercial densities, and the City of Fresno 2035 General Plan Circulation Element in the vicinity of the Project.

Near Term plus Project Traffic Conditions

This scenario evaluates total traffic volumes and roadway conditions based on the Near Term plus Project Traffic Conditions. The Near Term plus Project traffic volumes were obtained by adding the Near Term Projects' related trips to the Existing plus Project Traffic Conditions scenario.

Cumulative Year 2035 No Project Traffic Conditions

This scenario evaluates total traffic volumes and roadway conditions based on the Cumulative Year 2035 No Project Traffic Conditions. The Cumulative Year 2035 No Project traffic volumes were obtained by subtracting the 2035 Project Only Trips from the Cumulative Year 2035 plus Project Traffic Conditions scenario.

Cumulative Year 2035 plus Project Traffic Conditions

This scenario evaluates total traffic volumes and roadway conditions based on the Cumulative Year 2035 plus Project Traffic Conditions. The Cumulative Year 2035 plus Project traffic volumes were obtained from the Fresno COG traffic model runs (Base Year 2018 and Cumulative Year 2035) and existing traffic counts. Under this scenario, the increment method, as recommended by the Model Steering Committee, was utilized to determine the Cumulative Year 2035 plus Project traffic volumes. The Fresno COG Models are contained in JLB 2018 Appendix C. It should be noted that this study assumes that McKinley Avenue will exist west and east of Fowler Avenue by the year 2035 resulting in changes in travel patterns and volumes.

Project Access

Based on information provided to JLB, access to and from the Project site will be primarily from two (2) roadways. One of the proposed roadways is the future Kerry Avenue while the other is the future McKinley Avenue. It is worth noting that both of these proposed access points would likely only connect to Fowler Avenue under the Existing plus Project and Near Term plus Project scenarios. Furthermore, while access to the Project site from Kerry Avenue is proposed as a full access, access to Kerry Avenue from Fowler Avenue will be limited to a left-in, right-in, and right-out access only. By the Cumulative Year 2035 plus Project scenario, it is anticipated that McKinley Avenue will exist west and east of Fowler Avenue, and thus connect to Armstrong Avenue. Since a Project Site Plan is currently not available, it is recommended that the CUSD coordinate with the City of Fresno on the ultimate placement of the future Project driveways to ensure that

the location of the proposed access points relative to the existing local roads and driveways in the Project's vicinity are located at points that minimize traffic operational impacts to the roadway network.

JLB analyzed the conceptual roadways adjacent to the Project. Based on this review, it is recommended that the Project incorporate the recommendations presented in more detail within the Queuing Analysis for the intersection of McKinley Avenue and Fowler Avenue. By incorporating the recommendations presented in the Queuing Analyses, off-site traffic operations and circulation would be improved to acceptable levels.

Trip Generation

Trip generation rates for the proposed Project were obtained from the 10th Edition of the Trip Generation Manual published by the Institute of Transportation Engineers (ITE). Table E-17-2 presents the trip generation for the proposed Project with trip generation rates for an Elementary School. At build-out, the proposed Project is estimated to generate a maximum of 1,418 daily trips, 503 AM peak hour trips and 128 PM peak hour trips.

TABLE E-17-2
Project Trip Generation

Land Use (ITE Code)	*Size*	*Unit*	*Daily*		*(7-9) AM Peak Hour*						*(4-6) PM Peak Hour*					
			Rate	*Total*	*Trip Rate*	*In %*	*Out %*	*In*	*Out*	*Total*	*Trip Rate*	*In %*	*Out %*	*In*	*Out*	*Total*
Elementary School (520)	750	students	1.89	1,418	0.67	54	46	272	231	503	0.17	48	52	61	67	128
Total Project Trips				**1,418**				**272**	**231**	**503**				**61**	**67**	**128**

Trip Distribution

The trip distribution assumptions were developed based on the anticipated school boundary, existing travel patterns, the existing roadway network, engineering judgment, residential and commercial densities, and the City of Fresno 2035 General Plan Circulation Element. Figure 3 in JLB 2018 illustrates the 2018 Project Only Trips to the study intersections.

Conclusions and Recommendations

Existing Traffic Conditions

- At present, all study intersections operate at an acceptable LOS. However, the intersection of Olive Avenue and Fowler Avenue is operating at LOS F during both peak periods. While the City of Fresno has made the appropriate findings to designate LOS F as the criteria of significance for Fowler Avenue between McKinley Avenue and Olive Avenue, it did so under the assumption that up to four through lanes would be built on Fowler Avenue. To improve the LOS at this intersection, it is recommended that the following improvements, which are included within the City of Fresno Traffic Signal Mitigation Impact (TSMI) fee, be implemented.
  - Olive Avenue and Fowler Avenue
    - Add a northbound left-turn lane;
    - Modify the northbound left-through-right lane to a through-right lane;
    - Add a southbound left-turn lane;
    - Modify the southbound left-through-right lane to a through-right lane;
    - Signalize the intersection with protective left-turn phasing in all directions; and
    - Modify the intersection to accommodate the added lanes.
- At present, all study segments operate at an acceptable LOS.

Existing plus Project Traffic Conditions

- It is recommended that the CUSD coordinate with the City of Fresno on the ultimate placement of the future Project driveways to ensure that the location of the proposed access points relative to the

existing local roads and driveways in the Project's vicinity are located at points that minimize traffic operational impacts to the roadway network.

- It is recommended that the Project incorporate the recommendations presented in more detail within the Queuing Analysis for the intersection of McKinley Avenue and Fowler Avenue.
- It is recommended that the Project implement a Class II Bike Lane along its frontage to Fowler Avenue.
- It is recommended that the Project conduct a warrant analysis for a hybrid beacon across Clinton Avenue at the future Laverne Avenue intersection prior to construction of the Project.
- At build-out, the proposed Project is estimated to generate a maximum of 1,418 daily trips, 503 AM peak hour trips and 128 PM peak hour trips.
- It is recommended that the CUSD work with the City of Fresno to implement a Safe Routes to School plan and seek grant funding to help build walkways where they are lacking within a two-mile radius of the Project site.
- Under this scenario, all study intersections and segments are projected to operate at an acceptable LOS.

Near Term plus Project Traffic Conditions

- The total trip generation for the Near Term Projects is 112,465 daily trips, 8,520 AM peak hour trips and 10,859 PM peak hour trips.
- Under this scenario, the intersections of McKinley Avenue and Fowler Avenue and Floradora Avenue and Fowler Avenue are projected to operate at LOS F during one or both peak periods. While the City of Fresno has made the appropriate findings to designate LOS F as the criteria of significance for Fowler Avenue between McKinley Avenue and Olive Avenue, it did so under the assumption that up to four through lanes would be built on Fowler Avenue. To improve the LOS at these intersections, it is recommended that the following improvements be implemented.
    - McKinley Avenue and Fowler Avenue
        - Modify the northbound through-right lane to a through lane;
        - Add a second northbound through lane with a receiving lane north of McKinley Avenue;
        - Add a northbound right-turn lane;
        - Add a southbound left-turn lane;
        - Modify the southbound left-through lane to a through lane;
        - Add a second southbound through lane with a receiving lane south of McKinley Avenue; and
        - Implement an all-way stop control.
    - Floradora Avenue and Fowler Avenue
        - Add a westbound left-turn lane;
        - Modify the westbound left-right lane to a right-turn lane;
        - Add a northbound through lane with a receiving lane north of Floradora Avenue;
        - Add a southbound left-turn lane;
        - Modify the southbound left-through lane to a through lane;
        - Add a second southbound through lane with a receiving lane south of Floradora Avenue; and
        - Modify the intersection to accommodate the added lanes.
- Under this scenario, all study segments are projected to operate at an acceptable LOS.
- Between the Existing Traffic Conditions and the Near Term plus Project Traffic Conditions scenarios, the Project accounts for 1.2 percent of the daily trips, 5.6 percent of the AM peak hour trips, and 1.2 percent of the PM peak hour trips of growth in traffic, while the rest can be attributable to the Near Term Projects. Therefore, one can deduce that the majority of the mitigation measures presented under this scenario may not be necessary immediately upon completion of the proposed Project.

Cumulative Year 2035 No Project Traffic Conditions

- Under this scenario, the intersections of McKinley Avenue and Fowler Avenue, Floradora Avenue and Fowler Avenue, and Olive Avenue and Fowler Avenue are projected to operate at LOS F during both peak periods. While the City of Fresno has made the appropriate findings to designate LOS F as the criteria of significance for Fowler Avenue between McKinley Avenue and Olive Avenue, it did so under the assumption that up to four through lanes would be built on Fowler Avenue. Therefore, to improve the LOS at these intersections, it is recommended that the following improvements be implemented.
    - McKinley Avenue and Fowler Avenue
        - Modify the eastbound through-right lane to a through lane;
        - Add an eastbound right-turn lane;
        - Modify the westbound through-right lane to a through lane;
        - Add a westbound right-turn lane;
        - Modify the northbound through-right lane to a through lane;
        - Add a second northbound through lane with a receiving lane north of McKinley Avenue;
        - Add a northbound right-turn lane;
        - Modify the southbound through-right lane to a through lane;
        - Add a second southbound through lane with a receiving lane south of McKinley Avenue;
        - Add a southbound right-turn lane;
        - Signalize the intersection with protective left-turn phasing in all directions;
        - Implement overlap phasing of the eastbound right-turn with the northbound left-turn phase; and
        - Prohibit northbound to southbound U-turns.
    - Floradora Avenue and Fowler Avenue
        - Add a northbound through lane with a receiving lane north of Floradora Avenue;
        - Add a southbound through lane with a receiving lane south of Floradora Avenue;
        - Install a two-lane roundabout (for northbound and southbound traffic); and
        - Modify the intersection to accommodate the added lanes.
    - Olive Avenue and Fowler Avenue
        - Add a second westbound left-turn lane;
        - Add a second northbound through lane with a receiving lane north of Olive Avenue;
        - Add a second southbound through lane with a receiving lane south of Olive Avenue; and
        - Modify the traffic signal to accommodate the added lanes.
- Under this scenario, all study segments are projected to operate at an acceptable LOS.

Cumulative Year 2035 plus Project Traffic Conditions

- Under this scenario, the intersection of Clinton Avenue and Fowler Avenue is projected to exceed its LOS threshold during the AM peak period. To improve the LOS at this intersection, it is recommended that the following improvements be implemented.
    - Clinton Avenue and Fowler Avenue
        - Add a second northbound through lane;
        - Modify the southbound right-turn lane to a through-right lane and add a receiving lane south of Clinton Avenue; and
        - Modify the traffic signal to accommodate the added lanes.
- In addition, the intersections of McKinley Avenue and Fowler Avenue, Floradora Avenue and Fowler Avenue, and Olive Avenue and Fowler Avenue are projected to operate at LOS F during both peak periods. While the City of Fresno has made the appropriate findings to designate LOS F as the criteria of significance for Fowler Avenue between McKinley Avenue and Olive Avenue, it did so under the assumption that up to four through lanes would be built on Fowler Avenue. Therefore, to improve the LOS at these intersections, it is recommended that the following improvements be implemented.
    - McKinley Avenue and Fowler Avenue

        - Modify the eastbound through-right lane to a through lane;
        - Add an eastbound right-turn lane;
        - Modify the westbound through-right lane to a through lane;
        - Add a westbound right-turn lane;
        - Modify the northbound through-right lane to a through lane;
        - Add a second northbound through lane with a receiving lane north of McKinley Avenue;
        - Add a northbound right-turn lane;
        - Modify the southbound through-right lane to a through lane;
        - Add a second southbound through lane with a receiving lane south of McKinley Avenue;
        - Add a southbound right-turn lane;
        - Signalize the intersection with protective left-turn phasing in all directions;
        - Implement overlap phasing of the eastbound right-turn with the northbound left-turn phase; and
        - Prohibit northbound to southbound U-turns.
    - Floradora Avenue and Fowler Avenue
        - Add a northbound through lane with a receiving lane north of Floradora Avenue;
        - Add a southbound through lane with a receiving lane south of Floradora Avenue;
        - Install a two-lane roundabout (for northbound and southbound traffic); and
        - Modify the intersection to accommodate the added lanes.
    - Olive Avenue and Fowler Avenue
        - Add a second westbound left-turn lane;
        - Add a second northbound through lane with a receiving lane north of Olive Avenue;
        - Add a second southbound through lane with a receiving lane south of Olive Avenue; and
        - Modify the traffic signal to accommodate the added lanes.
- Moreover, while the intersection of Kerry Avenue and Fowler Avenue is projected to operate at an acceptable LOS during both peak periods, it was modified due to its proximity to both Clinton Avenue and McKinley Avenue. Therefore, it is recommended that the following improvements be implemented.
    - Kerry Avenue and Fowler Avenue
        - Add a northbound through lane with a receiving lane north of Kerry Avenue;
        - Add a southbound through lane with a receiving lane south of Kerry Avenue; and
        - Modify the intersection to accommodate the added lanes.
- Under this scenario, all study segments are projected to operate at an acceptable LOS.

Project's Pro-Rata Fair Share of Future Transportation Improvements

The Project's fair share percentage impact to study intersections projected to fall below their LOS threshold and which are not covered by an existing impact fee program is provided in Table E-17-3. The Project's fair share percentage impacts were calculated pursuant to the Caltrans Guide for the Preparation of Traffic Impact Studies. The Project's pro-rata fair shares were calculated utilizing the Existing volumes, 2035 Project Only Trips and Cumulative Year 2035 plus Project volumes. Figure 2 of JLB 2018 illustrates the Existing traffic volumes, Figure 8 of JLB 2018 illustrates the 2035 Project Only Trips, and Figure 9 of JLB 2018 illustrates the Cumulative Year 2035 plus Project traffic volumes. Since the critical peak period for the study facilities was determined to be during the AM peak, the AM peak volumes are utilized to determine the Project's pro-rata fair share.

It is recommended that the Project contribute its equitable fair share as listed in Table E-17-3 for the future improvements necessary to maintain an acceptable LOS. However, fair share contributions should only be made for those facilities or portion thereof currently not funded by the responsible agencies roadway impact fee program(s), as appropriate. For those improvements not presently covered by local and regional roadway impact fee programs, it is recommended that the Project contribute its equitable fair share.

Payment of the Project's equitable fair share in addition to the local and regional impact fee programs would satisfy the Project's traffic mitigation measures.

This study does not provide construction costs for the recommended mitigation measures; therefore, if the recommended mitigation measures are implemented, it is recommended that the District work with the City of Fresno to develop the estimated construction cost.

TABLE E-17-3
Project's Fair Share of Future Roadway Improvements

ID	*Intersection*	*Existing Traffic Volumes (AM Peak)*	*Cumulative Year 2035 plus Project Traffic Volumes (AM Peak)*	*2035 Project Only Trips (AM Peak)*	*Project's Fair Share (%)*
4	Floradora Avenue / Fowler Avenue	852	2,461	129	8.02%

Note: Project Fair Share = ((2035 Project Only Trips) / (Cumulative Year 2035 + Project Traffic Volumes - Existing Traffic Volumes)) x 100

TABLE E-17-4
Queuing Analysis

ID	*Intersection*	*Existing Queue Storage Length (ft.)*		*Existing*		*Existing plus Project*		*Near Term plus Project*		*Cumulative Year 2035 No Project*		*Cumulative Year 2035 plus Project*	
				AM	*PM*	*AM*	*PM*	*AM*	*PM*	*AM*	*PM*	*AM*	*PM*
1	Clinton Avenue / Fowler Avenue	EB Left	150	73	100	55	102	89	153	85	162	93	180
		WB Left	225	67	32	96	47	148	89	319	266	326	253
		WB Right	105	43	33	56	32	148	43	128	60	109	38
		NB Left	175	87	44	118	58	265	204	270	238	197	87
		NB Right	40	55	75	70	49	93	120	125	140	83	142
		SB Left	255	37	42	39	53	162	210	163	148	184	145
		SB Right	>500	83	27	74	30	55	40	96	49	*	*
2	Kerry Avenue / Fowler Avenue	WB Right	*	*	*	70	44	98	55	*	*	93	56
		SB Left	*	*	*	57	42	77	63	*	*	73	41
3	McKinley Avenue / Fowler Avenue	EB Left	*	*	*	*	*	*	*	89	118	104	145
		EB Right	*	*	*	*	*	*	*	142	147	165	135
		WB Left	*	*	*	58	45	43	29	276	116	345	163
		WB Right	*	*	*	49	25	27	27	44	29	58	45
		NB Left	*	*	*	*	*	*	*	296	273	331	265
		NB Right	*	*	*	*	*	52	46	70	79	65	70
		SB Left	*	*	*	*	*	69	43	*	104	229	117
		SB Right	*	*	*	*	*	*	*	50	57	148	57
4	Floradora Avenue / Fowler Avenue	WB Left	*	*	*	*	*	28	38	*	*	*	*
		WB Right	>500	*	*	*	*	21	25	*	*	*	*
		SB Left	*	*	*	*	*	37	20	*	*	*	*
		WB Approach	*	*	*	*	*	*	*	19	33	33	41
		NB Approach	*	*	*	*	*	*	*	91	73	79	58
		SB Approach	*	*	*	*	*	*	*	59	59	72	59

5	Olive Avenue / Fowler Avenue	EB Left	185	42	52	40	38	59	82	170	289	136	305
		EB Right	*	*	*	38	43	29	28	41	75	34	235
		WB Left	200	276	175	304	145	300	250	*	*	*	*
		WB Dual Lefts	*	*	*	*	*	*	*	303	162	304	200
		WB Right	*	*	*	0	10	0	22	8	35	17	34
		NB Left	*	48	29	30	12	45	35	54	46	66	25
		NB Right	*	*	*	35	53	133	143	62	134	59	131
		SB Left	*	13	9	33	0	33	24	78	26	152	29
		SB Right	*	*	*	15	15	259	26	144	57	321	57

Note: * = Does not exist or is not projected to exist

Mitigation Measures:

Mitigation Measure T-1: The District shall contribute its proportionate fair share for traffic improvements for those facilities or portions thereof not currently funded by the responsible agencies roadway impact fee program(s), as appropriate. The District's proportionate fair share is as indicated in Table E-17-3.

Mitigation Measure T-2: The District shall participate in a pro rata basis in the provision of adequate turn lane storage capacity as indicated in Table E-17-4.

Mitigation Measure T-3: The District shall install a Class II bike lane along its frontage to Fowler Avenue.

Mitigation Measure T-4: The District shall conduct a warrant analysis for a hybrid beacon across Clinton Avenue at the future Laverne Avenue intersection prior to construction of the Project.

Mitigation Measure T-5: As part of the Project, walkways shall be constructed along the Project's frontage to Fowler Avenue. Where possible, walkways shall be a minimum of six (6) feet wide and be separated from the street by a park strip or barrier curb to provide some separation between pedestrians and the paved portions of the road.

Mitigation Measure T-6: The District shall work with the City of Fresno to implement a Safe Routes to School plan and seek grant funding to help build walkways where they are lacking within a two-mile radius of the Project site.

b. Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less than Significant

Fresno Council of Governments (FCOG) is the Congestion Management Agency for Fresno County. FCOG has opted out of the California Congestion Management Program and is therefore exempt from the requirement to create a Congestion Management Plan. FCOG's Congestion Management Process (CMP) Update (FCOG 2017) switched focus from regionally significant roads to the urban freeways within the Fresno-Clovis Metropolitan Area. The proposed school site is not located on the revised CMP network.

c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Less than Significant

The proposed school site is less than one nautical mile from the Fresno Yosemite International Airport and is within the Traffic Pattern Zone (Safety Zone 6). All land uses within Safety Zone 6 are considered acceptable with little or no risk (City of Fresno 2012). The proposed site is not within the Airport Influence Area (AIA) and therefore not subject to the Airport Land Use Compatibility Plan. The project site is not within two nautical miles of an existing or proposed private airport. The proposed school would have no

design or operational characteristics that would result in an increase in air traffic levels or a change in location.

d. Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant

Any new and upgraded roadways will be designed according to applicable state and local design standards. The preliminary site plan involves the construction of a new road, future Kerry Avenue, along the north side of the site, which will provide one access point to the site. The design features of this project will comply with all City of Fresno policies.

e. Would the project result in inadequate emergency access?

Less than Significant

Clovis Unified will work with the City to ensure adequate emergency access to the proposed project and follow objectives and policies of the Fresno General Plan that will support implementation and provide adequate emergency access. In addition, as mentioned in Impact E, 17, d, the roadways associated with the project will be designed according to applicable governmental agency design standards. Emergency access may be hindered during periods of construction, but alternative routes would be available.

f. Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less than Significant

The District will provide busing services to all students that reside beyond one mile for K through 6th grade. Most of the existing and planned residential development within the school's attendance area is within the no bussing zone. As a result, most of the students will likely need to walk, bike, or be driven to school. Applicable plans include City of Fresno's General Plan and Active Transportation Plan. The Project supports the goals of these plans by enhancing the bicycle and pedestrian networks. The Project will include walkways and Class II bike lanes along Fowler Avenue. The District will work with the City to identify funding sources to complete Safe Routes to School paths and encourage the City to condition all new residential development proposals within a one-mile radius to conduct a Safe Routes to School evaluation from the project to the school site and require them to work on eliminating any barriers to the Safe Routes to School.

18. Tribal Cultural Resources

a. Would the project 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:

- **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**
- **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.**

Less than Significant with Mitigation

The District has not received any formal requests for tribal consultation under AB 52. All tribes on the Native American Heritage Commission (NAHC) list for this location were notified of the project by a Request for Preliminary Comment (RFC) that was mailed to them. No comment letters were received from any tribes.

The District has no information or evidence that Tribal Cultural Resources exist in relation to the site or will be affected by the project. However, it is possible that subsurface resources could exist and be disturbed by project construction activities. Therefore, the following mitigation measure has be incorporated into the project:

Mitigation Measure TC-1: If subsurface tribal cultural resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified tribal cultural resources professional shall be consulted to determine whether the resources require further study. If the resources are determined to be significant, mitigation measures shall be identified by the cultural resources professional and recommended to the District. If human remains are discovered, the procedures of Mitigation Measure CR-2 shall also apply.

19. Utilities and Service Systems

a. Water and Wastewater

Would the project:

- **Require or result in relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**
- **Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?**
- **Result in a determination by the wastewater treatment provider that 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?**

Less than Significant

The District would comply with the City of Fresno Municipal Code and Standard Construction requirements for sewer and water connections, extensions, fees, permits, and related matters.

Water

Table E-19-1 on the following page shows the estimated water use from the general plan designated land use for the site that existed prior to August 30, 2018, when the City of Fresno approved a plan amendment that changed the land use designation of the school site from Medium Density Residential to Public Facility/Elementary School. Medium Density Residential was the site designation for which long term water planning occurred when the latest General Plan was adopted in 2014. Table E-19-2 shows the actual metered volumes taken from nearby comparable schools within the District. The tables indicate that estimated water use for the proposed project, at approximately 35 acre-feet per year, will be significantly less than the 66 acre-feet per year for the Medium Density Residential development anticipated under the Fresno General Plan land use designation adopted in 2014.

Wastewater

Table E-19-3 on the following page compares the estimated wastewater generation of the proposed project with the estimated wastewater generation from the general plan designated land use for the site that existed prior to August 30, 2018, when the City of Fresno approved a plan amendment that changed the land use designation of the school site from Medium Density Residential to Public Facility/Elementary School. This is derived by taking the domestic (indoor) portion of the estimated water use, approximately 1.7 acre-feet per year, converting it to gallons per day (gpd) and reducing it by a factor of 20 percent. Table E-19-3 indicates that the proposed project, at an estimated 1,214 gallons per day, will generate significantly less wastewater than the 18,854 gallons per day generated by the Medium Density Residential development anticipated under the Fresno General Plan land use designation adopted in 2014.

The Fresno-Clovis Regional Wastewater Reclamation Facility operates in compliance with applicable requirements of the Regional Water Quality Control Board. Although the project would contribute to the

cumulative impact described in the Fresno General Plan EIR, the cumulative impacts of full buildout were found to be less than significant with mitigation.

Stormwater

The Fresno Metropolitan Flood Control District (FMFCD) is responsible for managing urban stormwater runoff within the Fresno area. The site is within FMFCD Drainage Area "BS" and will be served by an existing pipeline that runs along Fowler Avenue. The District will enter into an agreement with FMFCD that will include Items 2a through 2c in FMFCD's letter, dated March 27, 2018. For more information on drainage, see Section E, 10, c.

Power and Telecommunications

The project site is located approximately ¼ mile from existing urban development in the City of Fresno. The District's administration and consultants have received no indication that the project would have any potentially significant impacts related to power and communications.

TABLE E-19-1
Estimated Water Use – Planned Land Use

	Acres	Land Use	Use Type	Units	af/du/yr	af/yr
Planned Land Use (2014 GP)	22	Residential Medium Density (6 du/ac)	Domestic	132	0.2	26.4
			Irrigation	132	0.3	39.6
Estimated Total for Project						**66.0**

Source: Odell Planning & Research, Inc. 2018; Tully & Young. *Land Use/Water Supply Guidebook*. 2007

TABLE E-19-2
Estimated Water Use – Existing Comparable Schools

	Land Use	Use Type	af/yr
Oraze Elementary (2012-2017 average)	Elementary School	Domestic Use	1.7
		Irrigation Use	32.0
Total			33.7
Boris Elementary (2017)	Elementary School	Domestic Use	1.1
		Irrigation Use	33.6
Total			34.7
Estimated Total for Project			**35.0**

Source: Odell Planning & Research, Inc. 2018; Clovis Unified School District 2018; Blair, Church & Flynn, 2018.

TABLE E-19-3
Estimated Wastewater Generation

Land Use	**Indoor Water Use from Table E-19-2**	**Convert to Gallons Per Day**	**Wastewater Generation (20% Reduction in Domestic Demand)**
Planned Land Use (2014 GP)	26.4 af/yr	23,568 gpd	18,854 gpd
Elementary School	1.7 af/yr	1,517 gpd	1,214 gpd

Source: Odell Planning & Research, Inc. 2018; Tully & Young. *Land Use/Water Supply Guidebook*. 2007 ; Blair, Church & Flynn, 2018.

b. Would the project:

a. **Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure?**
b. **Negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?**
c. **Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

Less than Significant

The District contracts for solid waste services with Industrial Waste and Salvage (IWS). IWS uses a materials recovery facility, the Cedar Avenue Recycling and Transfer Station (CARTS), to divert recyclable material before transporting the remaining material to the Fairmead Landfill in Madera County. The Fairmead Landfill has a life expectancy of 26 years under current practices with an estimated closure date in 2044. The General Plan EIR states that buildout of the general plan will have a less than significant impact on solid waste disposal needs. The District operates its existing schools and would operate the proposed project in compliance with applicable statutes and regulation related to solid waste.

20. Wildfire

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

- **Impair an adopted emergency response plan or emergency evacuation plan?**
- **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?**
- **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?**
- **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?**

No Impact

The project site is not in or near a moderate, high, or very high fire hazard severity zone within a Local Responsibility Area (LRA) or State Sesponsibility Area SRA.

21. Mandatory Findings of Significance

a. Does the proposed school project 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?

Less than Significant with Mitigation

Based on the information in Sections E, 4 and E, 5, the project could have potentially significant effects on biological and cultural resources, but these effects would be less than significant with the incorporation of the mitigation measures provided.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means 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)

Less than Significant

Based on the information in Sections E, 1 – E, 20, the proposed project would not have any impacts that would be individually limited but cumulatively considerable.

c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant with Mitigation

Based on the information in Sections E, 3 and E, 13, the proposed school project could potentially have substantial adverse effects on human beings with respect to air quality and noise. However, mitigation measures have been incorporated in the project that would reduce the impacts to insignificance.

F. Mitigation Monitoring and Reporting Program

1. Purpose

The District has prepared this Mitigation Monitoring and Reporting Program to comply with Section 15097 of the State CEQA Guidelines. The purpose for the Mitigation Monitoring and Reporting Program is to ensure implementation of the mitigation measures identified in this Initial Study.

2. Lead Agency

Clovis Unified School District will undertake the project and is the Lead Agency for the project. The District is responsible for the implementation of all mitigation measures identified in this Initial Study.

3. Mitigation Monitoring and Reporting Coordinator

The Assistant Superintendent, Facility Services, or his/her designee shall act as the Project Mitigation Monitoring and Reporting Coordinator ("Coordinator").

4. Monitoring and Reporting Procedures for Design-, Site Clearing-, and Construction Mitigation Measures

a. The Coordinator shall provide a copy of all project design-, site clearing- and construction-related mitigation measures to the project engineer and contractor for incorporation in the project plans, construction specifications, permits, and contracts, as appropriate.

b. Prior to award of bid, the Coordinator shall determine that all project design-, site clearing- and construction-related mitigation measures have been incorporated in the project plans, construction specifications, permits, and contracts, as appropriate.

c. During construction, the Coordinator, through the construction management team, shall inspect the project area regularly to ensure all work complies with the mitigation measures. If a discrepancy is not resolved within a reasonable time, the Coordinator may order work to cease until the discrepancy is resolved.

d. Prior to the District accepting the project improvements, the Coordinator shall certify that the project incorporates all project design and construction-related mitigation measures.

5. Monitoring and Reporting Procedures for Operational- and Maintenance-Related Mitigation Measures

Before the project becomes operational, the Coordinator shall determine that the project operational plans and procedures incorporate all operations-related mitigation measures.

G. Names of Persons Who Prepared or Participated in the Initial Study

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H. Sources Consulted

Following are the documents and other sources consulted in preparing this Initial Study:

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