

# Draft Initial Study and Mitigated Negative Declaration for Tulare County Office of Education Administrative Office and Conference Center

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Prepared By:



**4CREEKS**

4Creeks, Inc.  
324 S Santa Fe, Suite A  
Visalia, CA 93292

Prepared For:

**Tulare County**  
**Office of Education**  
*Tim A. Hire, County Superintendent of Schools*

Kings County  
1400 W. Lacey Blvd  
Hanford, CA 93230

## CONTENTS

<b>1.</b>	<b>CEQA Review Process .....</b>	<b>1-3</b>
1.1	California Environmental Quality Act Guidelines .....	1-3
1.2	Initial Study/Mitigated Negative Declaration.....	1-3
1.3	Environmental Checklist .....	1-4
1.4	Notice of Intent to Adopt a Negative Declaration.....	1-4
1.5	Negative Declaration or Mitigated Negative Declaration.....	1-5
1.6	Intended Uses of Initial Study/Negative Declaration Documents.....	1-5
1.7	Notice of Determination (NOD) .....	1-5
1.8	CEQA Process Flow Chart.....	1-7
<b>2.</b>	<b>Project Description.....</b>	<b>2-1</b>
2.1	Project Description and Purpose.....	2-1
2.2	Project Location.....	2-2
2.3	Other Permits and Approvals.....	2-3
<b>3.</b>	<b>Evaluation of Environmental Impacts.....</b>	<b>3-1</b>
3.1	Purpose .....	3-1
3.2	Initial Study/Mitigated Negative Declaration.....	3-2
3.3	Evaluation Of Environmental Impacts.....	3-9
3.4	Environmental Factors Potentially Affected .....	3-10
3.5	Environmental Analysis .....	3-11
	I. AESTHETICS .....	3-12
	II. AGRICULTURE AND FOREST RESOURCES:.....	3-18
	III. AIR QUALITY.....	3-27
	IV. BIOLOGICAL RESOURCES.....	3-41
	<b>IV. CULTURAL RESOURCES.....</b>	<b>3-60</b>
	V. ENERGY.....	3-74
	VI. GEOLOGY AND SOILS .....	3-81
	VII. GREENHOUSE GAS EMISSIONS.....	3-90
	VIII. HAZARDS AND HAZARDOUS MATERIALS.....	3-98
	IX. HYDROLOGY AND WATER QUALITY.....	3-106
	X. LAND USE AND PLANNING.....	3-115
	XI. MINERAL RESOURCES .....	3-119
	XII NOISE.....	3-121
	XIII. POPULATION AND HOUSING .....	3-129
	XIV. PUBLIC SERVICES.....	3-132
	XV. RECREATION.....	3-138
	XVI. TRANSPORTATION.....	3-142
	XVII. TRIBAL CULTURAL RESOURCES.....	3-149
	XIX. UTILITIES AND SERVICE SYSTEMS .....	3-162
	XX. WILDFIRE .....	3-169
	MANDATORY FINDINGS OF SIGNIFICANCE .....	3-173
3.6	MITIGATION MONITORING AND REPORTING PROGRAM.....	3-175
3.7	REFERENCES.....	3-181
<b>4.</b>	<b>List of Preparers .....</b>	<b>4-1</b>

**LIST OF FIGURES**

**Figure 1-1. CEQA Process Flow Chart ..... 1-7**  
**Figure 2-1. Regional Location Map..... 2-5**  
**Figure 2-2 Vicinity Map..... 2-6**  
**Figure 2-3 Site Plan.....2-7**  
**Figure 2-4 Demolition Plan ..... 2-8**  
**Figure 3-1. Important Farmlands Map..... 3-22**  
**Figure 3-2 Soils Map .....3-84**  
**Figure 3-3. Construction Related Noise Levels Based on Distance from Construction Equipment ..3-125**

**LIST OF TABLES**

<b>Table 3-1. Important Farmland Developed Under 2030 General Plan. ....</b>	<b>3-23</b>
<b>Table 3-2. San Joaquin Valley Attainment Status. ....</b>	<b>3-28</b>
<b>Table 3-3. Ambient Air Quality Standards.....</b>	<b>3-30</b>
<b>Table 3-4. SJVAPCD Thresholds of Significance for Criteria Pollutants .....</b>	<b>Error! Bookmark not defined.</b>
<b>Table 3-5. Criteria Pollutant Emissions Compared to SJVAPCD Thresholds of Significance .....</b>	<b>3-34</b>
<b>Table 3-6 Maximum Daily Criteria Pollutant Emissions Compared to SJVAPCD AAQA Thresholds..</b>	<b>3-35</b>
<b>Table 3-7 HRA Results Compared to SJVAPCD Thresholds of Significance .....</b>	<b>3-38</b>
<b>Table 3-8. Special Status Species Potentially on Project Site .....</b>	<b>3-43</b>
<b>Table 3-9. 2022 SCE and 2022 State Power Resources. ....</b>	<b>3-74</b>
<b>Table 3-10 Project Energy Use by Land Use1 .....</b>	<b>3-77</b>
<b>Table 3-14. Greenhouse Gases .....</b>	<b>3-91</b>
<b>Table 3-15. Project Consistency with Climate Action Plan Strategies .....</b>	<b>3-95</b>
<b>Table 3-16 City of Visalia Noise Standards .....</b>	<b>3-122</b>
<b>Table 3-17. Noise Levels of Noise-generating Construction Equipment at Various Distances .....</b>	<b>3-125</b>
<b>Table 3-18. Vibration Levels Generated by Construction Equipment. ....</b>	<b>3-126</b>
<b>Table 3-19. Mitigation Monitoring and Reporting Program.....</b>	<b>3-175</b>

**Tulare County Office of Education**

6200 South Mooney Boulevard  
 Visalia, CA 93277

**1. CEQA Review Process**

***Project Title: Tulare County Office of Education Expansion***

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**1.1 California Environmental Quality Act Guidelines**

Section 15063 of the California Environmental Quality Act (CEQA) Guidelines requires that the Lead Agency prepare an Initial Study to determine whether a discretionary project will have a significant effect on the environment. All phases of the project planning, implementation, and operation must be considered in the Initial Study. The purposes of an Initial Study, as listed under Section 15063(c) of the CEQA Guidelines, include:

- (1) *Provide the lead agency with information to use as the basis for deciding whether to prepare an EIR or negative declaration;*
- (2) *Enable an applicant or lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration;*
- (3) *Assist the preparation of an EIR, if one is required, by:*
  - (a) *Focusing the EIR on the effects determined to be significant,*
  - (b) *Identifying the effects determined not to be significant,*
  - (c) *Explaining the reasons for determining that potentially significant effects would not be significant, and*
  - (d) *Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.*
- (4) *Facilitate environmental assessment early in the design of a project;*
- (5) *Provide documentation of the factual basis for the finding in a negative declaration that a project will not have a significant effect on the environment*
- (6) *Eliminate unnecessary EIRs;*
- (7) *Determine whether a previously prepared EIR could be used with the project.*

**1.2 Initial Study/Mitigated Negative Declaration**

The Initial Study provided herein covers the potential environmental effects of the construction and operation of an expansion to the existing Tulare County Office of Education Administrative Office and Conference Center (TCOE/AOCC) site on an approximately 28.0-acre area. The property where the expansion/addition will occur is currently zoned by County of Tulare as AE-20 (Agriculture 20-Acre Minimum). The Tulare County Office of Education (TCOE) will act as the

Lead Agency for processing the Initial Study/Mitigated Negative Declaration pursuant to the CEQA Guidelines. Following CEQA approval of this Project, the TCOE will coordinate annexation efforts with and into the City of Visalia as a separate CEQA process.

### **1.3 Environmental Checklist**

The Lead Agency may use the CEQA Environmental Checklist Form [CEQA Guidelines, Section 15063(d)(3) and (f)] in preparation of an Initial Study to provide information for determination if there are significant effects of the project on the environment. A copy of the completed Environmental Checklist is set forth in **Section Three**.

### **1.4 Notice of Intent to Adopt a Negative Declaration**

The Lead Agency shall provide a Notice of Intent to Adopt a Negative Declaration (CEQA Guidelines, Section 15072) to the public, responsible agencies, trustee agencies and the County Clerk within which the project is located, sufficiently prior to adoption by the Lead Agency of the Negative Declaration to allow the public and agencies the review period. The public review period (CEQA Guidelines, Section 15105b) shall not be less than 20 days when the Initial Study/Negative Declaration is submitted to the State Clearinghouse.

Prior to approving the project, the Lead Agency shall consider the proposed Negative Declaration together with any comments received during the public review process, and shall adopt the proposed Negative Declaration only if it finds on the basis of the whole record before it, that there is no substantial evidence that the project will have a significant effect on the environment and that the Negative Declaration reflects the Lead Agency's independent judgment and analysis.

The written and oral comments received during the public review period will be considered by The Tulare County Office of Education prior to adopting the Negative Declaration. Regardless of the type of CEQA document that must be prepared, the overall purpose of the CEQA process is to:

- 1) Assure that the environment and public health and safety are protected in the face of discretionary projects initiated by public agencies or private concerns;
- 2) Provide for full disclosure of the project's environmental effects to the public, the agency decision-makers who will approve or deny the project, and the responsible trustee agencies charged with managing resources (e.g. wildlife, air quality) that may be affected by the project; and
- 3) Provide a forum for public participation in the decision-making process pertaining to potential environmental effects.

According to Section 15070(a) a public agency shall prepare or have prepared a proposed negative declaration for a project subject to CEQA when:

*The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment. Less than significant impacts with mitigation measures have been identified.*

The Environmental Checklist Discussion contained in Section Three of this document has determined that the environmental impacts of the project are less than significant with mitigation measures and that a Mitigated Negative Declaration is adequate for adoption by the Lead Agency.

### **1.5 Negative Declaration or Mitigated Negative Declaration**

The Lead Agency shall prepare or have prepared a proposed Negative Declaration or Mitigated Negative Declaration (CEQA Guidelines Section 15070) for a project subject to CEQA when the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment. The proposed Negative Declaration or Mitigated Negative Declaration circulated for public review shall include the following:

- (a) A brief description of the project, including a commonly used name for the project.
- (b) The location of the project, preferably shown on a map.
- (c) A proposed finding that the project will not have a significant effect on the environment.
- (d) An attached copy of the Initial Study documenting reasons to support the finding.
- (e) Mitigation measures, if any.

### **1.6 Intended Uses of Initial Study/Negative Declaration Documents**

The Initial Study/Negative Declaration document is an informational document that is intended to inform decision-makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed project. The environmental review process has been established to enable the public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency must balance any potential environmental effects against other public objectives, including economic and social goals. The Tulare County Office of Education, as Lead Agency, will make a determination based on the environmental review for the Environmental Study, Initial Study and comments from interested parties (e.g., responsible agencies, the general public, others) if there are less than significant impacts from the proposed project and the requirements of CEQA can be satisfied by adoption of a Mitigated Negative Declaration.

### **1.7 Notice of Determination (NOD)**

The Lead Agency shall file a Notice of Determination within five working days after deciding to approve the project. The Notice of Determination (CEQA Guidelines, Section 15075) shall include the following:

- (1) *An identification of the project including the project title as identified on the proposed negative declaration, its location, and the State Clearinghouse identification number for the proposed negative declaration if the notice of determination is filed with the State Clearinghouse.*
- (2) *A brief description of the project.*
- (3) *The agency's name and the date on which the agency approved the project.*
- (4) *The determination of the agency that the project will not have a significant effect on the environment.*
- (5) *A statement that a negative declaration or a mitigated negative declaration was adopted pursuant to the provisions of CEQA.*
- (6) *A statement indicating whether mitigation measures were made a condition of the approval of the project, and whether a mitigation monitoring plan/program was adopted.*
- (7) *The address where a copy of the negative declaration or mitigated negative declaration may be examined.*
- (8) *The identity of the person undertaking a project which is supported, in whole or in part, through contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies or the identity of the person receiving a lease, permit, license, certificate, or other entitlement for use from one or more public agencies.*

### 1.8 CEQA Process Flow Chart

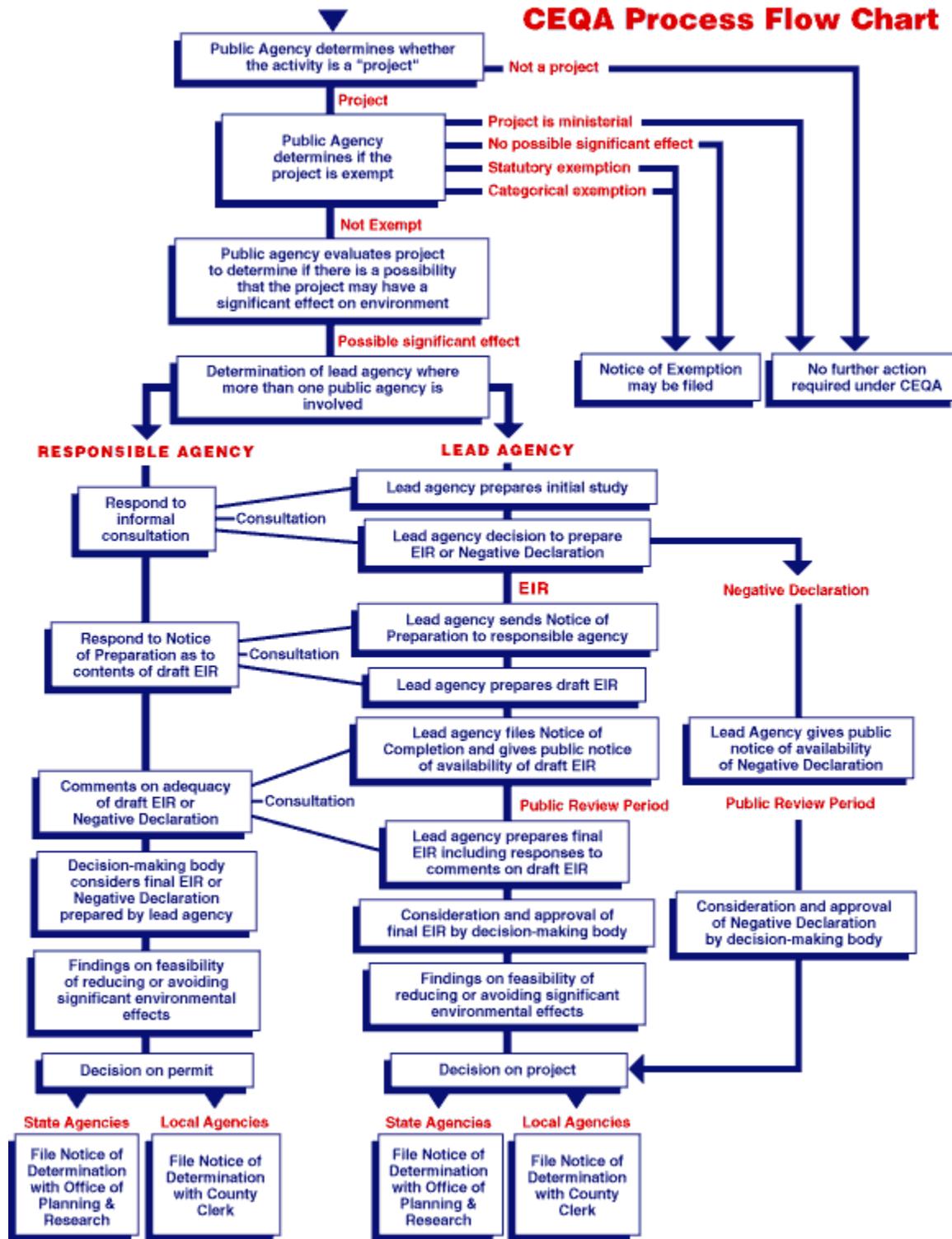


Figure 1-1. CEQA Process Flow Chart

## **2. Project Description**

### ***Project Title: Tulare County Office of Education Expansion***

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#### **2.1 Project Description and Purpose**

The Tulare County Office of Education (TCOE) proposes to expand and add additional facilities to its existing Administrative Office and Conference Center (AOCC) site, located at 6200 South Mooney Boulevard, Visalia, Tulare County, California. The TCOE has acquired an adjacent approximately 12.546 acres, which will be merged with the existing site to form a single parcel for development.

The additional Project will provide approximately 108,000 square feet of office and conference room space, three classrooms with a training kitchen totaling 6,200 square feet, and approximately 35,000 square feet of warehouse space. All buildings on this portion of the site will be single-story in height. A stormwater ponding basin will be constructed along the southern boundary of the property for on-site drainage. Parking facilities surrounding the development will provide 388 parking stalls, including 17 accessible spaces. Vehicular access to the site will be provided from South Mooney Boulevard/SR 63 to the west and Avenue 264/Liberty Road to the south. The primary use of this facility will be to host professional development trainings and workshops for District employees.

In addition to the expansion, TCOE has completed construction of an Administration and Conference Center on an adjacent 11.03-acre parcel at the same address. This component of the project included approximately 87,000 square feet of building space, consisting of a three-story professional office building located in the northeast portion of the site and a single-story conference center in the southwest portion. The buildings have a maximum height of approximately 50 feet. The site design included three landscaped ponding areas for stormwater retention and a greenbelt along the northern boundary. On the east side of the property, 2.5 acres were reserved for future expansion. Surrounding the building, 379 parking stalls are provided for employees and visitors, including seven (7) standard accessible spaces and two (2) van-accessible spaces. All current vehicular traffic enters and exits the site via South Mooney Boulevard. The existing facility is primarily used to host conferences, educational training, and up to three large-scale conferences per year.

The proposed expansion/addition area is currently vacant land previously used for agriculture (walnut orchards). An approximately 2.68 expansion area will require demolition/removal of the following existing structures (see Figure 2-4):

- concrete curb;
- concrete curb and gutter;
- concrete paving;
- river rock;
- plant/tree;
- chain link fencing/gate;
- light pole;
- catch basin;
- underground utility line; and
- shipping container (to be relocated/salvaged to adjacent property owner).

The site is currently within the jurisdiction of the County of Tulare and does not lie within the Visalia Planning Area or any of the City's three Urban Design Tiers. The proposed Project would result in annexation of the expansion area into the City of Visalia. Upon annexation and full buildout, the Project will contribute to the TCOE's planned long-term growth and support coordinated, integrated planning within Visalia's urban core.

## **2.2 Project Location**

The proposed Project site is located in an unincorporated area in central Tulare County, immediately adjacent to an abutting the southern portion of the City of Visalia's Planning Area. The site lies east of Mooney Boulevard (SR 63) and north of Avenue 264/Liberty Road. It is situated approximately 700 feet south of Mooney Grove Park and approximately 1,125 feet south of Cameron Creek (which is within Mooney Grove Park). Tulare County Government Plaza is approximately 1,150 feet northwest of the expansion area.

The Project consists of annexation of approximately 38.63 acres to the City of Visalia, a Conditional Use Permit for approximately 27.92 acres of the area to be annexed, and a Lot Line Adjustment that would result in three lots totaling 25, 11.03 and 12.53 acres respectively being merged into two lots totaling 27.93 and 19.45 acres. The lot line adjustment would involve three parcels (APNs 122-470-003, 122-480-004, and 122-480-008). Parcel 1 would include the existing 11.03-acre parcel currently developed as the Tulare County Office of Education Administration and Conference Center and a portion of two parcels (from APNs 122-470-03 and 122-480-08) for a combined 27.93-acre parcel to accommodate the expansion of facilities. Parcel 2 would expand from 12.53 acres to 19.45 acres following the lot line adjustment. APN 122-048-004 is under the jurisdiction of the City of Visalia and is zoned Mixed Use Commercial; while APNs 122-470-03 and 122-480-08 are under jurisdiction of the County of Tulare and zoned as AE-20 (Exclusive Agriculture, 20-acre minimum). An approximately 2.68-acre portion of APN 122-480-08 would be transferred to APN 122-480-04 and an approximately 9.92-acre portion of APN 122-470-03 would be transferred to APN 122-480-08.

The expansion/addition area is topographically flat and currently vacant land previously used for agriculture generally located in the east and southeast portion of the expansion/addition area.

Surrounding land uses include walnut orchards to the east, the existing TCOE Administration and Conference facilities to the west, single-family residential (mobile home park) to the south and scattered rural residences to the north, mixed commercial uses to the southwest, and an institutional use (church with accessory uses) to the south. As noted earlier, the site is currently zoned for agricultural (AE-20) by the County of Tulare but will be pre-zoned as Quasi-Public (QP) by the City of Visalia as part of the proposed annexation.

The Project is not within the planning area of the Visalia General Plan. As such, the Project area would be annexed and designated as Public/Institutional to complement the existing City of Visalia's zoning classification of the Tulare County Office of Education facility immediately west and adjacent to the Project area. In addition to access/egress into the site from the existing TCOE facility use (i.e., Mooney Boulevard/SR 63), an additional access/egress point would be established from Avenue 264/Liberty Road along the southern area of the proposed Project site.

### **2.3 Other Permits and Approvals**

In addition to the Project components regarding the expansion, other administrative changes will be necessary to transfer jurisdiction from the County of Tulare to the City of Visalia (City). Although these administrative changes do not directly result in a physical change in the environment, they would ultimately provide the City with the jurisdiction/authority to grant discretionary approvals. Subsequently, the administrative approvals would, as a sequential function, allow the physical changes to the environment (that is, the Project site) to accommodate development of the proposed Project. The following discretionary approvals are required from the City of Visalia:

- Approval of City of Visalia Pre-Zone Application.
- Approval of City of Visalia City Limits Boundary Change/Annexation
- Approval of City of Visalia General Plan Amendment
- Approval of City of Visalia Conditional Use Permit
- Approval from Cal Water to provide water service
- Central Valley Regional Water Quality Control Board, Stormwater Pollution Prevention Plan (SWPPP).

The following ministerial approvals are required from the City of Visalia:

- City of Visalia Building and Encroachment Permits
- Roadway Dedication of future Avenue 264/Liberty Road.
- Approval of water and sewer infrastructure
- City of Visalia Grading Permits
- City of Visalia Site Plan Review
- City of Visalia Lot Line Adjustment

**California Water Service (Calwater)** The proposed Project would be required to receive water service from Calwater.

**San Joaquin Valley Air Pollution Control District (SJVAPCD):** The proposed Project is within the jurisdiction of the SJVAPCD (or Air District) and will be required to comply with Regulation VIII (Fugitive PM10 Prohibitions), Dust Control Plan, Rules 3135, 4101, 4601, 4702, 9410, 9510, and others as specified by the Air District.

**Central Valley Regional Water Quality Control Board, SWPPP:** The proposed Project site is within the jurisdiction of the Central Valley Regional Water Quality Control Board (RWQCB). The Central Valley RWQCB will require a Storm Water Pollution Prevention Plan (SWPPP) to prevent impacts related to stormwater during active project construction-related activities.

**Tulare County Local Agency Formation Commission (LAFCO):** Tulare County LAFCO approval will be required to change jurisdiction (i.e., reorganization) from the County of Tulare to the City of Visalia.

Figure 2-1. Regional Location Map

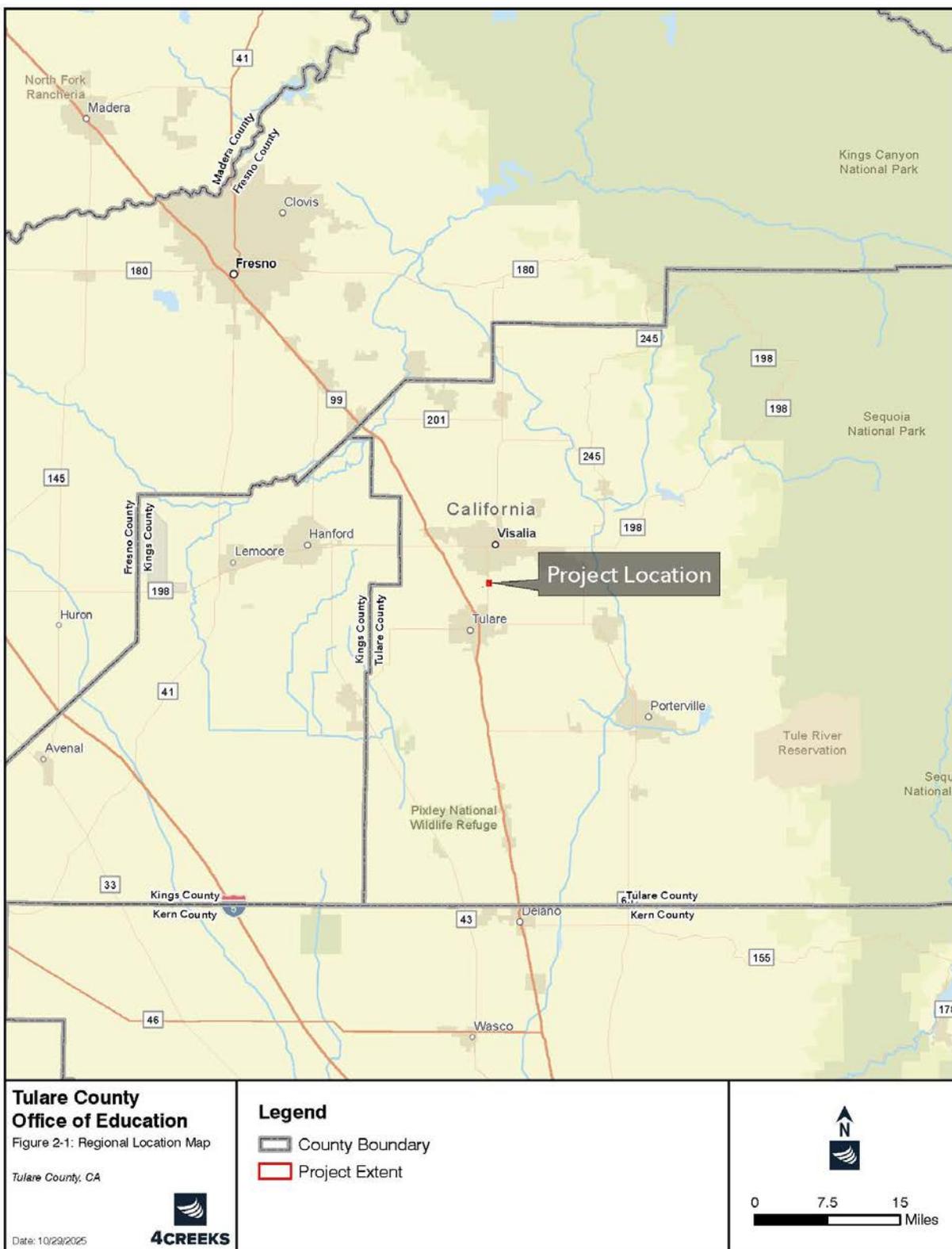




Figure 2-3 Site Plan

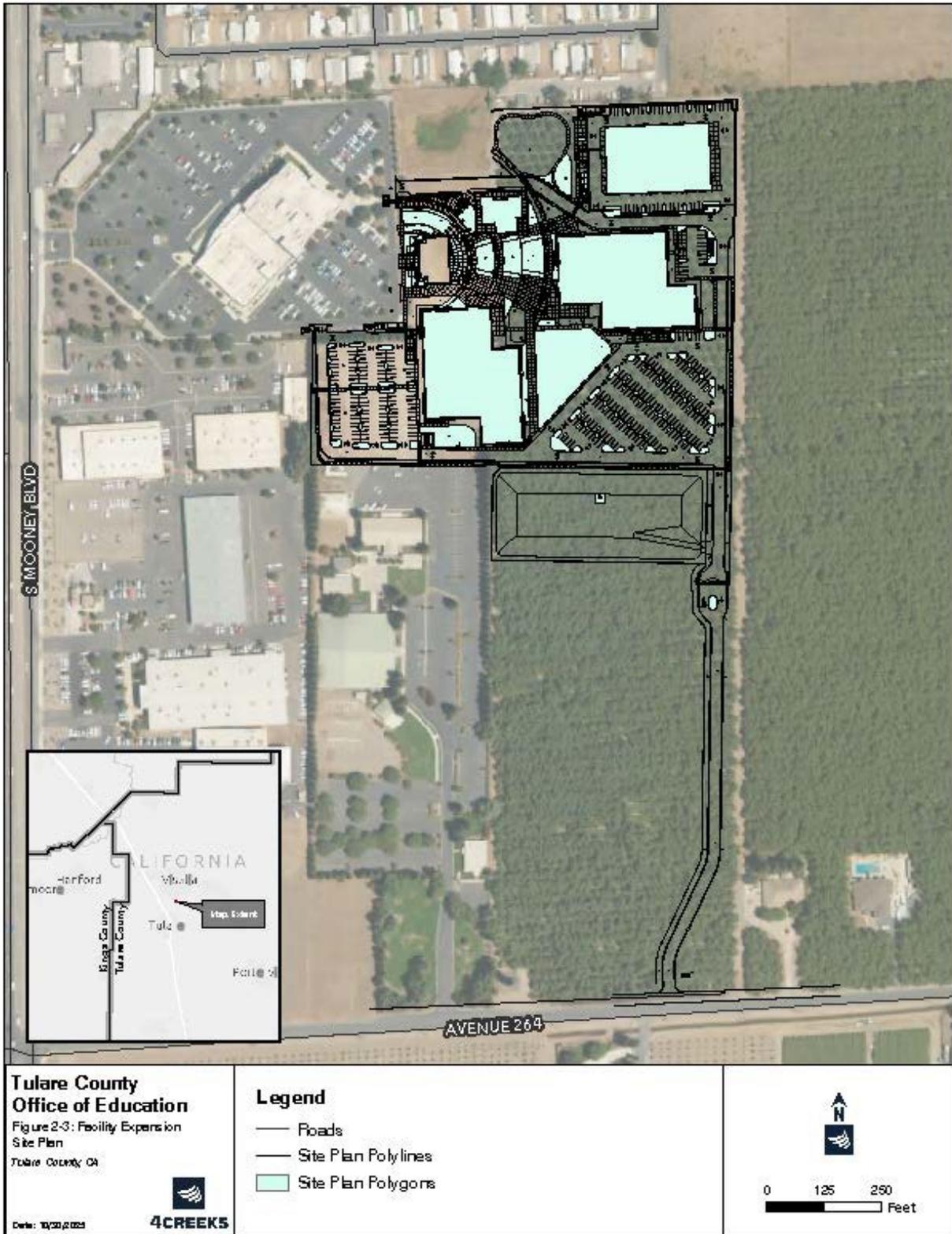
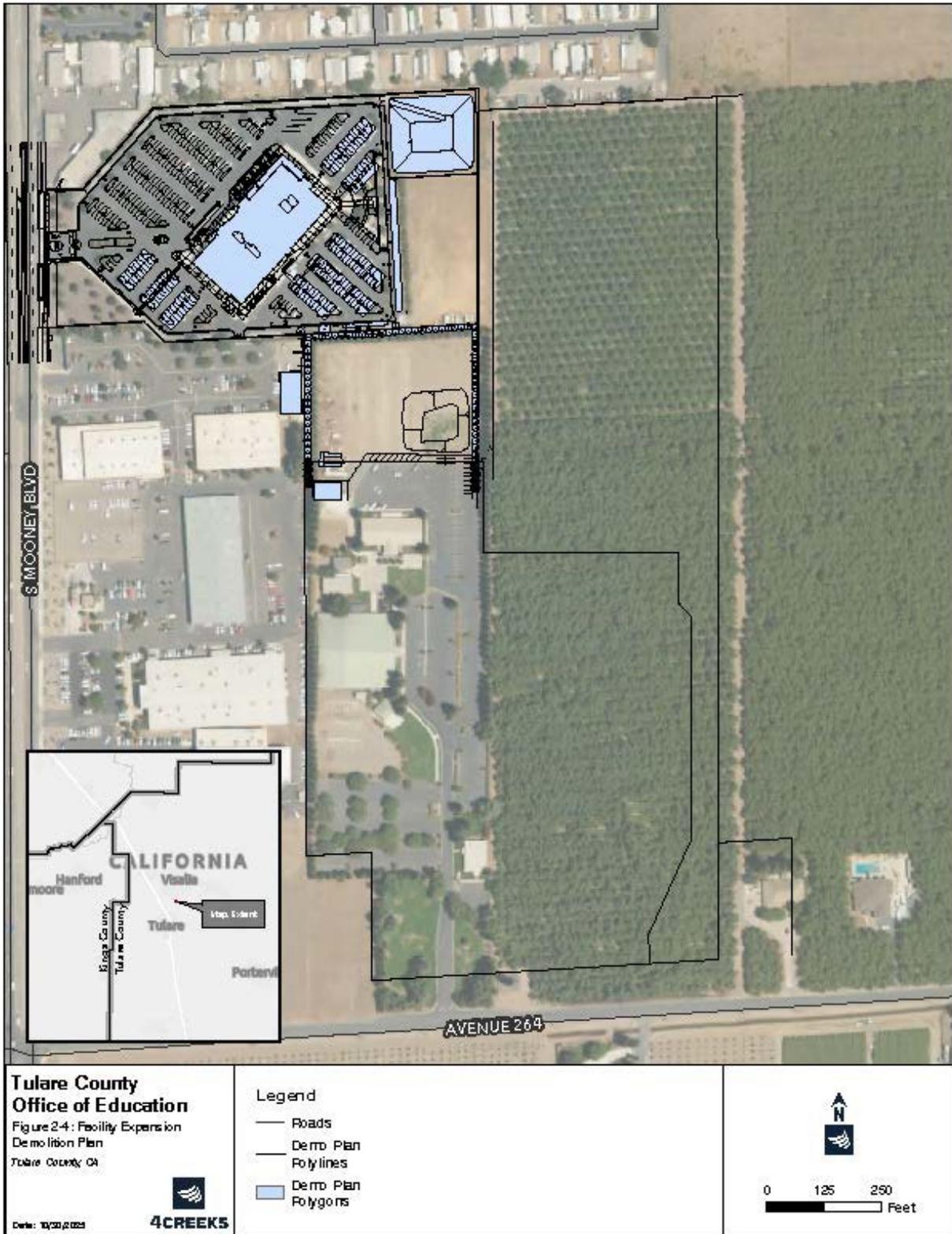


Figure 2-4 Demolition Plan



### **3. Evaluation of Environmental Impacts**

#### ***Project Title: Tulare County Office of Education Expansion/Addition***

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This document is the Initial Study/Mitigated Negative Declaration (IS/MND or MND) for the proposed construction and operation to expand the area and develop additional facilities (see earlier Project description) to the existing Tulare County Office of Education's (TCOE) Administration and Conference Building site located at 6200 South Mooney Boulevard, Visalia, Tulare County, California. The TCOE has acquired an adjacent 12.53 acres, which will be merged with the existing site to form a single parcel for development.

The additional Project will provide approximately 108,000 additional square feet of office and conference room space, three classrooms with a training kitchen totaling 6,200 square feet, and approximately 35,000 square feet of warehouse space. The expansion area is currently within the jurisdiction of the County of Tulare and would be annexed into the City of Visalia. The Tulare County Office of Education will act as Lead Agency for this Project pursuant to the California Environmental Quality Act (CEQA) and the CEQA Guidelines.

#### **3.1 Purpose**

The purpose of this environmental document is to implement the California Environmental Quality Act (CEQA). Section 15002(a) of the CEQA Guidelines describes the basic purposes of CEQA as follows.

- (1) Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.*
- (2) Identify the ways that environmental damage can be avoided or significantly reduced.*
- (3) Prevent significant, avoidable damage to the environment by requiring changes in Projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.*
- (4) Disclose to the public the reasons why a governmental agency approved the Project in the manner the agency chose if significant environmental effects are involved.*

This Initial Study of environmental impacts has been prepared to conform to the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.). According to Section 15070, a public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a Project subject to CEQA when:

- (a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the Project may have a significant effect on the*

*environment, or*

*(b) The initial study identifies potentially significant effects, but:*

*(1) Revisions in the Project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and*

*(2) There is no substantial evidence, in light of the whole record before the agency, that the Project as revised may have a significant effect on the environment.*

### **3.2 Initial Study/Mitigated Negative Declaration**

1. **Project Title:** Tulare County Office of Education Expansion
2. **Lead Agency:** Tulare County Office of Education  
Contact Person: Jeff Ramsay, Director of General Services  
6200 South Mooney Boulevard  
Visalia, CA 93277  
Phone Number: (559) 733-6601
3. **Applicant:** Same as above
4. **Project Location:** The proposed Project site is located within an unincorporated portion of The County of Tulare, just east and directly adjacent to the City of Visalia Planning Area in Tulare County. The site is northeast of Mooney Boulevard (SR 65) and Avenue 264/Liberty Road). The site is topographically flat with vacant land (formerly walnut orchards) to the east, the existing TCOE Administration and Conference facilities to the west, single-family residential (mobile home park) and rural residences to the north, institutional use (church with accessory uses), mixed commercial uses to the southwest. The site is currently zoned AE-20 (Exclusive Agriculture, 20 Acre Minimum Site Area) by the County of Tulare but will be zoned Quasi-Public/Institutional (QP) by the City of Visalia upon annexation.
5. **General Plan Designation:** The proposed Project site does not contain a City of Visalia General Plan designation but would be designated as a Public/Institutional Use upon annexation. The site is currently designated as Agriculture by the County of Tulare.
6. **Zoning Designation:** The site is currently zoned AE-20 (Exclusive Agriculture, 20 Acre Minimum) by the County of Tulare, but for annexation purposes would be pre-zoned as Quasi-Public (QP) by the City of Visalia pending annexation.
7. **Project Description:** In summary, the Project includes the following components:
  - Annexation (requires Tulare County Local Agency Formation Commission (LAFCO) approval)
  - General Plan Amendment (City of Visalia)

- City Limits Boundary Changes/Annexation (City of Visalia)
  - Conditional Use Permit (City of Visalia)
  - Lot Line Adjustment (City of Visalia)
8. As noted earlier, the overall Project consists of annexation of approximately 38.63 acres to the City of Visalia, a Conditional Use Permit for approximately 27.92 acres of the area to be annexed, and a Lot Line Adjustment that would result in three lots totaling 25, 11.03 and 12.53 acres respectively being merged into two lots totaling 27.93 and 19.45 acres. The lot line adjustment would involve three parcels (APNs 122-470-003, 122-480-004, and 122-480-008). Parcel 1 would include the existing 11.03-acre parcel currently developed as the Tulare County Office of Education Administration and Conference Center and a portion of two parcels (from APNs 122-470-03 and 122-480-08) for a combined 27.93-acre parcel to accommodate the expansion of facilities (that is, [list]). Parcel 2 would expand from 12.53 acres to 19.45 acres following the lot line adjustment. APN 122-048-004 is under the jurisdiction of the City of Visalia and is zoned Mixed Use Commercial; while APNs 122-470-03 and 122-480-08 are under jurisdiction of the County of Tulare and zoned as AE-20 (Exclusive Agriculture, 20-acre minimum). An approximately 2.68-acre portion of APN 122-480-08 would be transferred to APN 122-480-04 and an approximately 9.92-acre portion of APN 122-470-03 would be transferred to APN 122-480-08.

The additional Project will provide approximately 108,000 square feet of office and conference room space, three classrooms with a training kitchen totaling 6,200 square feet, and approximately 35,000 square feet of warehouse space. All buildings on this portion of the site will be single-story in height. A stormwater ponding basin will be constructed along the southern boundary of the property for on-site drainage. Parking facilities surrounding the development will provide 388 parking stalls, including 17 accessible spaces. Vehicular access to the site will be provided from South Mooney Boulevard/SR 63 to the west and Avenue 264/Liberty Road to the south. The primary use of this facility will be to host professional development training and workshops for District employees.

As noted earlier, the proposed TCOE/AOCC expansion site was formerly used for agriculture (walnut orchards) and would require some demolition of existing structures (i.e., curbs, gutter, concrete paving, chain-link fence/gate, catch basin, etc., see Figure 2-4) in the southern portion of the Project site.

#### **8. Surrounding Land Uses and Settings:**

- **North:** Visalia General Plan, Mixed Use Commercial (C-MU) and Residential Low Density; Zoning R-1.5; currently mobile home park and mixed commercial (to the northwest).
- **South:** Tulare County General Plan, Agriculture; AE-20, 20-acre minimum Zoning; currently commercial-office, religious institution.
- **East:** Tulare County General Plan, Agricultural and County of Tulare zoning of AE-20, 20-acre minimum, currently agricultural use (walnuts) and rural residence.

- **West:** Tulare County General Plan, Zoning AE-20, 20-acre minimum; Visalia General Plan, Mixed Use Commercial, Visalia Zoning, Mixed Use Commercial; currently existing Tulare County Office of Education Administration and Conference Center.

## 9. Required Approvals:

The following discretionary approvals are required from the City of Visalia:

- Approval of City of Visalia Pre-Zone Application.
- Approval of City of Visalia City Limits Boundary Change/Annexation
- Approval of City of Visalia General Plan Amendment
- Approval of City of Visalia Conditional Use Permit
- Approval from Cal Water to provide water service
- Central Valley Regional Water Quality Control Board, Stormwater Pollution Prevention Plan (SWPPP).

The following discretionary approvals may be required from other agencies:

- Caltrans
- Central Valley Regional Water Quality Control Board, Stormwater Pollution Prevention Plan (SWPPP)
- San Joaquin Valley Air Pollution Control District (SJVAPCD or Air District) such as Regulation VIII, Rules 3135, 4101, 9510, and others as determined by the Air District (see Air Quality section)

The following ministerial approvals are required from the City of Visalia:

- City of Visalia Building and Encroachment Permits
- Roadway Dedication of future Avenue 264/Liberty Road.
- Approval of water and sewer infrastructure
- City of Visalia Grading Permits
- City of Visalia Site Plan Review
- City of Visalia Lot Line Adjustment

**10. Native American Consultation:** The State requires lead agencies to consider the potential effects of proposed Projects and consult with California Native American tribes during the local planning process for the purpose of protecting Traditional Tribal Cultural Resources through the California Environmental Quality Act (CEQA) Guidelines. Pursuant to PRC Section 21080.3.1, the lead agency shall begin consultation with the California Native American tribe that is traditionally and culturally affiliated with the geographical area of the proposed Project. Such significant cultural resources are either sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe which is either on or eligible for inclusion in the California Historic Register or local historic register, or, the lead agency, at its discretion, and support by substantial evidence, choose to treat the resources as a Tribal Cultural Resources (PRC Section 21074(a)(1-2)). According to the most

recent census data, California is home to 109 currently recognized Native American tribes. Tribes in California currently have nearly 100 separate reservations or Rancherias. The tribes that were formally noticed of this Project were the Kitanemuk & Yowlumne Tejon Indians, Santa Rosa Rancheria Tachi Yokut Tribe, Table Mountain Rancheria, Tule River Indian Tribe, and the Wuksache Indian Tribe/Eshom Valley Band. These Tribes are not located within the City limits.

Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and Project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See PRC Section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per PRC Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality.

As of the release date of this document, no Tribes provided a response.

- 11. Parking and access:** Vehicular access/egress to the Project will be available via the existing Mooney Boulevard (SR 63). Access/egress point and a new access/egress along the eastern border of the site to Avenue 264/Liberty Road). The Project includes 388 parking stalls, including 17 accessible spaces as required by (Chapter 17.34 Off-Street Parking and Loading Facilities) of the Visalia Municipal Code.

During construction, workers will utilize existing parking areas and/or temporary construction staging areas for parking vehicles and equipment.

- 12. Landscaping and Design:** Design, landscape and irrigation plans will be required during the building permit and final site plan review submittal process. These plans will be subject to approval by the site plan review committee. All landscaped areas shall meet the requirements of the Water Efficient Landscape Ordinance of the City of Visalia and will comply with the State Model Water Efficient Landscape Ordinance. The specific provisions of the City's landscaping requirements can be found in Chapter 17.30.015 of the City of Visalia's Municipal Code.

- 13. Utilities and Electrical Services:** The Project would result in onsite and offsite infrastructure improvements including new and relocated utilities. Water (which will be provided by Calwater) and sewer services will be extended onto the Project site, which are planned improvements according to the City of Visalia General Plan (2014). Electricity would be provided by Southern California Edison, if needed Southern California Gas Company can also provide natural gas to the Project. All storm water flows resulting from both construction and operation will be diverted to a new stormwater detention basin.

**14. Roadway Improvements:** The Project (as it will ultimately be part of the existing TCOE Administration Office and Conference Center) currently includes extensive streetscape improvements along Mooney Boulevard (the main access/egress point of the current TCOE facilities). Mooney Boulevard (State Route 63) functions as an arterial street is presently configured as a four-lane roadway supporting bi-directional traffic. Avenue 264/Liberty Road lacks curbs, gutters, and sidewalks on both sides of the street. The planned improvements include the installation of these elements along the northern side of Avenue 264/Liberty Road to City of Visalia specifications/standards along Project impacted areas.

## Acronyms

ACHP	Advisory Council on Historic Preservation
AFY	acre feet per year
BAU	Business as Usual
BMP	Best Management Practices
BRE	Biological Resource Evaluation
CAA	Clean Air Act
Cal Fire	California Department of Forestry and Fire Protection
CALUP	Tulare County Airport Comprehensive Airport Land Use Plan
CBC	California Building Code
CCAP	Climate Change Action Plan
CCR	California Code of Regulation
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFGC	California Fish and Game Code
CHRIS	California Historical Resources Information System
CNDDDB	California Natural Diversity Database
CNPPA	California Native Plant Protection Act of 1977
CNPS	California Natural Plant Society
CRA	Cultural Resources Assessment
CRHR	California Register of Historic Places
CWA	California Water Act
CDFW	California Department of Fish and Game
DHS	Department of Health Services
FESA	Federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FMBT	Federal Migratory Bird Treaty Act
FMMP	Important Farmland Mapping and Monitoring Program
HCP	Habitat Conservation Plan
Hz	Hertz
IS/MND	Initial Study Mitigated Negative Declaration(or MND)
ISR	Indirect Source Review
LAFCO	Tulare County Local Agency Formation Commission
MALF	Map Aerial Locator Tool
MCL	Maximum Contaminant Level
MEIR	Master Environmental Impact Report
MGD	million gallons per day
MJLHMP	Tulare County Multi-Jurisdictional Local Hazard Mitigation Plan
NOI	Notice of Intent
ND	Negative Declaration

NAC	Noise Abatement Criteria
NAHC	California Native American Heritage Commission
NOD	Notice of Determination
NPDES	National Pollutant Discharge Elimination System
PRC	California Public Resources Code
QP	Quasi-Public
RCRA	Resource Conservation and Recovery Act of 1976
ROW	Right-of-Way
RWQCB	Regional Water Quality Control Board
SCE	Southern California Edison
SHPO	State Historic Preservation Office
SLF	Sacred Lands File
SJVAPCD	San Joaquin Valley Air Pollution Control District (or Air District)
SSJVIC	Southern San Joaquin Information Center
SR	State Route
SRA	State Responsibility Area
SWPPP	Storm Water Pollution Prevention Plan
TCOE	Tulare County Office of Education
TCOE/AOCC	Tulare County Office of Education Administrative Office and Conference Center
TCR	Tribal Cultural Resource
UWMP	Urban Water Management Plan
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VMC	City of Visalia Municipal Code
VMT	Vehicle Miles Travelled
WRF	City of Visalia Water Reclamation Facility

### 3.3 Evaluation Of Environmental Impacts

1. A brief explanation is required for all answers except “no Impact” answers that are adequately supported by the information sources a lead agency cites, in the parentheses following each question. A “No Impact” answer is adequately supported if the reference information sources show that the impact simply does not apply to Projects like the one involved (e.g., the Project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on Project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on a Project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as Project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant with Mitigation Incorporated” (also known as “Less Than Significant with Mitigation”) applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c) (3)(D). In this case, a brief discussion should identify the following.
  - Earlier Analysis Used. Identify and state where they are available for review.
  - Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated.” Describe mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the Project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

**3.4 Environmental Factors Potentially Affected**

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Aesthetics                       | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Agriculture and Forest Resources | <input type="checkbox"/> Hazards & Hazardous Materials       | <input type="checkbox"/> Recreation                         |
| <input checked="" type="checkbox"/> Air Quality           | <input type="checkbox"/> Hydrology and Water Quality         | <input checked="" type="checkbox"/> Transportation          |
| <input checked="" type="checkbox"/> Biological Resources  | <input type="checkbox"/> Land Use and Planning               | <input checked="" type="checkbox"/> Tribal Cultural         |
| <input checked="" type="checkbox"/> Cultural Resources    | <input type="checkbox"/> Mineral Resources                   | <input type="checkbox"/> Utilities and Service              |
| <input type="checkbox"/> Energy                           | <input type="checkbox"/> Noise                               | <input type="checkbox"/> Wildfire                           |
| <input checked="" type="checkbox"/> Geology and soils     | <input type="checkbox"/> Population                          | <input type="checkbox"/> Mandatory Findings of Significance |

**DETERMINATION:** (To be completed by the Lead Agency) Where potential impacts are anticipated to be significant, mitigation measures will be required, so that impacts may be avoided or reduced to insignificant levels. On the basis of this initial evaluation:

- I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION WILL BE PREPARED.
- I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. A Negative Declaration is required, but it must analyze only the effects that remain to be addressed.  
I find that although the proposed Project could have a significant effect on the environment because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is requested.

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SIGNATURE	DATE
<u>Jeff Ramsay, Director of General Services</u>	<u>Tulare County Office of Education</u>
PRINTED NAME	AGENCY

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### 3.5 Environmental Analysis

The following section provides an evaluation of the impact categories and questions contained in the checklist and identify mitigation measures, if applicable.

A substantial portion of the project area is located within the boundary area analyzed by the adopted/certified City of Visalia 2030 General Plan Environmental Impact Report. This Project, following annexation, would be consistent with General Plan land use designations and pre-zoning classifications. Thus, where applicable and appropriate, the discussions regarding Environmental Setting, Regulatory Setting, CEQA requirements, all Resources discussions, etc.; contained in the Visalia 2030 General Plan and Visalia 2030 General Plan EIR are incorporated herein by reference in their entirety. Components included as part of the Draft and or Final General Plan EIR such as Technical Studies, Mitigation Measures, Responses to Comments, Findings, Resolutions, etc., as applicable, are incorporated by reference herein in their entirety. Where necessary, and if available, additional site-specific facts, data, information, technical studies, etc., are included in these Resource discussions. Reference is made to City of Visalia General Plan policies, zoning map/ordinance, and other standards, permits, thresholds, etc. as applicable to the City of Visalia as it will be the jurisdictional body when the annexation process is completed. Where applicable some County of Tulare policies and other regulatory requirements may still apply (for example, where the County of Tulare Health and Human Services Agency/Division of Health Services has purview) following annexation into the City of Visalia.

I. AESTHETICS

Except as provided in Public Resource Code Section 210999, would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Environmental Setting**

*Scenic Resources*

Scenic resources include landscapes and features that are visually or aesthetically pleasing. They contribute positively to a distinct community or region. These resources produce a visual benefit upon communities. The City of Visalia has a visual character of a mix of rural and built environments. Visalia is surrounded by natural open space agricultural land, characterized by uses such as grazing, open space, and cultivated agriculture. Downtown Visalia is the physical, cultural, and economic center of the City, with historical homes surrounding the downtown area. The St. Johns River flows along the north side of Visalia’s city limits and is approximately 5.5 miles north of the Project Site. Sequoia National Forest is situated in the Sierra Nevada Mountain Range that lies east of the City limits. Valley Oak trees, both individually and in groves, also provide an important scenic feature and link to the natural setting of the San Joaquin Valley. The goal of Visalia’s General Plan regarding visual resources is to preserve and re-

establish the City's natural waterway system and Valley Oak trees with parks, conservation areas, and trailways.

### *Scenic Vistas*

The Visalia General Plan identifies the Sierra Nevada mountains to the east and agricultural lands surrounding the city as scenic vistas surrounding Visalia.

### *Existing Visual Character*

The Project site is relatively flat as it previously was used for agricultural purposes. The expansion area cannot be viewed from external perspectives as it will be developed behind the existing TCOE structures from Mooney Boulevard on the west, residential uses north of the Project site, the existing walnut orchard from the east, and the existing institutional use (church and accessory uses) from the south. However, site photographs can be viewed in both biological and cultural studies (Appendices B and C; respectively).

## **Regulatory Setting**

### **Federal**

None that apply to the Project.

### **State**

#### *Scenic Roadways*

The California Scenic Highway Program was established in 1963 by the State Legislature for the purpose of protecting and enhancing the natural beauty of California highways and adjacent corridors through conservation strategies. The State Scenic Highway System includes a list of highways that have either been officially designated or are eligible for designation. State laws affiliated with governing the scenic highway program can be found in Sections 260-263 in The Street and Highways Code.

#### *State Scenic Highways*

According to the California Department of Transportation mapping of State Scenic Highways, the City of Visalia does not have officially designated State Scenic Highways, however the City has one eligible State Scenic Highway, a 44-mile stretch of State Route (SR) 198 from SR 99 to Sequoia National Park. An eligible State highway needs to adopt a Scenic Corridor Protection Program and approval from the Director of Caltrans to be officially designated as a scenic corridor in the state of California. Visalia's general Plan has already designated this stretch as a scenic corridor in the City's General Plan. This segment of SR 198 is approximately six (6) miles

north of the proposed site.

## **Regional/Local**

### *City of Visalia General Plan*

The 2030 General Plan includes policies related to aesthetic resources that correlate to the proposed Project:

- *LU-P-28*: Continue to use natural and man-made edges, such as major roadways and waterways within the City's Urban Area Boundary, as urban development limit and growth phasing lines.
- *LU-P-34*: Work with Tulare County to prevent urban development of agricultural land outside of the current growth boundaries and to promote the use of agricultural preserves, where they will promote orderly development.
- *LU-P-72*: Ensure that noise, traffic, and other potential conflicts that may arise in a mix of commercial and residential uses are mitigated through good site planning, building design, and/or appropriate operational measures.

### *City of Visalia Zoning Ordinance*

The Visalia Zoning Ordinance governs the distribution and intensity of land uses, sets the principles for evaluating development and guides the development and growth of the City. The Zoning Ordinance establishes specific development criteria for each zoning district (i.e., parking requirements, walls, fencing, setbacks, building height, etc.).

## **Discussion**

### **a) Would the Project have a substantial adverse effect on a scenic vista?**

**Less than Significant Impact:** A scenic vista is defined as a viewpoint that provides expansive views of highly valued landscape for the benefit of the general public. The Sierra Nevada mountains to the east and agricultural lands surrounding the City are the primary scenic vistas within this region. The site is topographically flat, with walnut orchards to the east, the existing TCOE Administration and Conference facilities (existing TCOE facilities) to the west, single-family residential (mobile home park) to the south and rural residences to the north, mixed commercial uses to the southwest, and an institutional use (church with accessory uses) to the south. The Sierra Nevada foothills are approximately 18 miles east of the Project site. The construction of Project-related structures would partially obstruct the view of walnut orchards east of the site. The Project will change the current vistas to adjacent uses. Rather than the existing walnut orchard to the east, these views would be partially replaced with office and conference room space, three classrooms with a training kitchen, and warehouse space on the northern sector of the Project site. However, the

Project would not substantially alter scenic views as defined in the context used herein and would be consistent with the land uses contained in the adopted Visalia General Plan. Therefore, based on the information and analysis provided herein, there would be *a less than significant impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**b) Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within state scenic highway?**

**No Impact:** There are no officially designated State Scenic Highways located in the City of Visalia or near the site. The proposed Project would not damage any scenic resources within a state scenic highway; therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

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

**No Impact:** As noted earlier, the proposed Project site will be annexed into the Visalia Planning Area. Also as noted earlier, the site is topographically flat, with walnut orchards to the east, the existing TCOE Administration and Conference facilities to the west, single-family residential (mobile home park) and rural residences to the north, mixed commercial uses to the southwest, and an institutional use (church with accessory uses) to the south. The Project site's existing Tulare County General Plan land use designation is Agriculture; however, the area would be designated as Public/Institutional upon annexation into the City of Visalia. The materials, signage, fencing, landscaping, and building materials used in the construction of the Project will be selected based on their ability to improve the overall visual character of the area. The proposed Project will comply with all applicable zoning and other regulations governing scenic quality. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required.*

**d) Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

**Less than Significant Impact:** The proposed Project would result in new lighting sources on the Project site typical of quasi-public development. New lighting sources would include interior lighting from parking area lighting, street lighting, and security lighting. All street and landscape lighting will be consistent with the City's lighting standards, as applicable, which are developed to minimize impacts related to excessive light and glare. Although the Project will introduce new light sources to the area, all lighting will be consistent with adjacent residential land uses and the City's lighting standards. Therefore, based on the information and analysis provided herein, there would be a *less than significant impact.*

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required.*

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required.*

**Cumulative Impact: Less than Significant.**

Generally, both Tulare County and Visalia reflect a rural and mixed built environment. It is recognized that population growth results in the need for additional school administrative facilities to accommodate students resulting from a growing population and to provide administrative support for educators and administrators and specialized classroom environment (in the form of the proposed three classrooms and kitchen). The proposed Project, while replacing vacant land previously used for agricultural, is consistent with both the County of Tulare and City of Visalia General Plans to minimize impacts to agricultural areas and areas with scenic vistas by guiding development toward urbanized areas. As noted earlier, the Project area is bound by the existing TCOE Administration and Conference facilities to the west, walnut orchard to the east, single-family residential (mobile home park) and scattered rural residences to the north, an institutional use (church with accessory uses), and mixed commercial uses to the southwest. Annexation into the City and the public/institutional use of the Project effectively implement the goals/policies of both the County's and City's respective General Plans in regard to minimizing impacts to aesthetic resources. As such, based on the

information and analysis provided herein, the *cumulative impact would be less than significant*.

II. AGRICULTURE AND FOREST RESOURCES:

<p><b>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the Project:</b></p>	<p>Potentially Significant Impact</p>	<p>Less Than Significant With Mitigation Incorporation</p>	<p>Less than Significant Impact</p>	<p>No Impact</p>
<p>a) 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?</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>
<p>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>

timberland Production (as defined by Government Code section 51104(g))?				
d) Result in the loss of forestland or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Environmental Setting**

Central California is one of the world’s premier growing regions. Agriculture is an important economic resource for Visalia and the surrounding areas. 39,518 acres, or 65 percent, of the Visalia Planning Area is farmland, producing fruit and nut crops, vegetables, nursery products (trees), apiary products (honey), seed crops (cotton), industrial crops (timber), field crops (alfalfa, barley, corn), and livestock. The proposed Project site is not currently located within the Visalia Planning Area. The proposed Project site is not under the Williamson Act Contract or a Farmland Security Zone contract. Figure 3-1 shows the proposed site is designated as Prime Farmland under the Important Farmland Mapping and Monitoring Program (FMMP). The Site is not within the City of Visalia’s Tier 2 and Tier 3 Development Boundary and outside any Urban Growth Boundary established by the City of Visalia General Plan, however, it is designated as Agriculture by the County of Tulare. Although the existing TCOE facilities are located within Urban and Built Up Land, the area where the proposed Project will occur is designated as Prime Farmland (see: California Department of Conservation (DOC), Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Rural Land Mapping Edition, Tulare County Important Farmland 2020 is available upon request from the DOC website at: <https://maps.conservation.ca.gov/agriculture/>). It is also noted that the proposed expansion site is currently vacant and was previously used for agriculture (walnut orchard).

**Regulatory Setting**

**Federal**

None that apply to the Project.

**State**

*California Land Conservation Act of 1965 (Williamson Act)*

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, allows local governments to enter into contracts with private landowners to restrict the activities on specific parcels of land to agricultural or open space uses. The landowners benefit from the contract by receiving greatly reduced property tax assessments. The California Land Conservation Act is overseen by the California Department of Conservation; however, local governments are responsible for determining specific allowed uses and enforcing the contract.

#### *California Farmland Mapping and Monitoring Program (FMMP)*

The FMMP is implemented by the California Department of Conservation (DOC) to conserve and protect agricultural lands within the State. Land is included in this program based on soil type, annual crop yields, and other factors that influence the quality of farmland. The FMMP mapping categories for the most important statewide farmland are as follows:

- **Prime Farmland** has the ideal physical and chemical composition for crop production. It has been used for irrigated production in the four years prior to classification and can produce sustained yields. 51 percent of the Visalia Planning Area is classified as Prime Farmland.
- **Farmland of Statewide Importance** has also been used for irrigated production in the four years prior to classification and is only slightly poorer quality than Prime Farmland. 11 percent of the Visalia Planning Area is classified as Farmland of Statewide Importance.
- **Unique Farmland** has been cropped in the four years prior to classification and does not meet the criteria for Prime Farmland or Farmland of Statewide Importance but has produced specific crops with high economic value. Less than 1 percent of the Visalia Planning Area is classified as Unique Farmland.
- **Farmland of Local Importance** encompasses farmland that does not meet the criteria for the previous three categories. These may lack irrigation, produce major crops, be zoned as agricultural, and/or support dairy. 2 percent of the Visalia Planning Area is classified as Farmland of Local Importance.

### **Regional/Local**

#### *County of Tulare Right to Farm Ordinance*

Tulare County adopted a "Right to Farm Ordinance," to protect the rights of commercial farming operations, while promoting a "good neighbor policy" between these uses. Under this ordinance, property owners and residents are made aware that they may experience inconveniences due to commercial agricultural operations. However, upon annexation into the City this Ordinance would no longer apply to the site.

#### *Tulare County General Plan*

The 2030 Tulare County General Plan contains the following goals related to agricultural resources that correlate to the proposed Project:

- *AG-1.7 Preservation of Agricultural Lands.* The County shall promote the preservation of its agricultural economic base and open space resources through the implementation of resource management programs and the identification of maximum growth parameters for all urban areas located in the County.

The proposed Projects would eliminate the need for conversion of agricultural land by locating the expansion and addition of the existing TCOE facilities immediately adjacent to the east and southeast. As such, although the Project would lead to the conversion of land suitable to accommodate an agricultural use, the Project is ripe for and would also result in a reasonable expansion of an urbanized use rather than consumption of agricultural land at a different location.

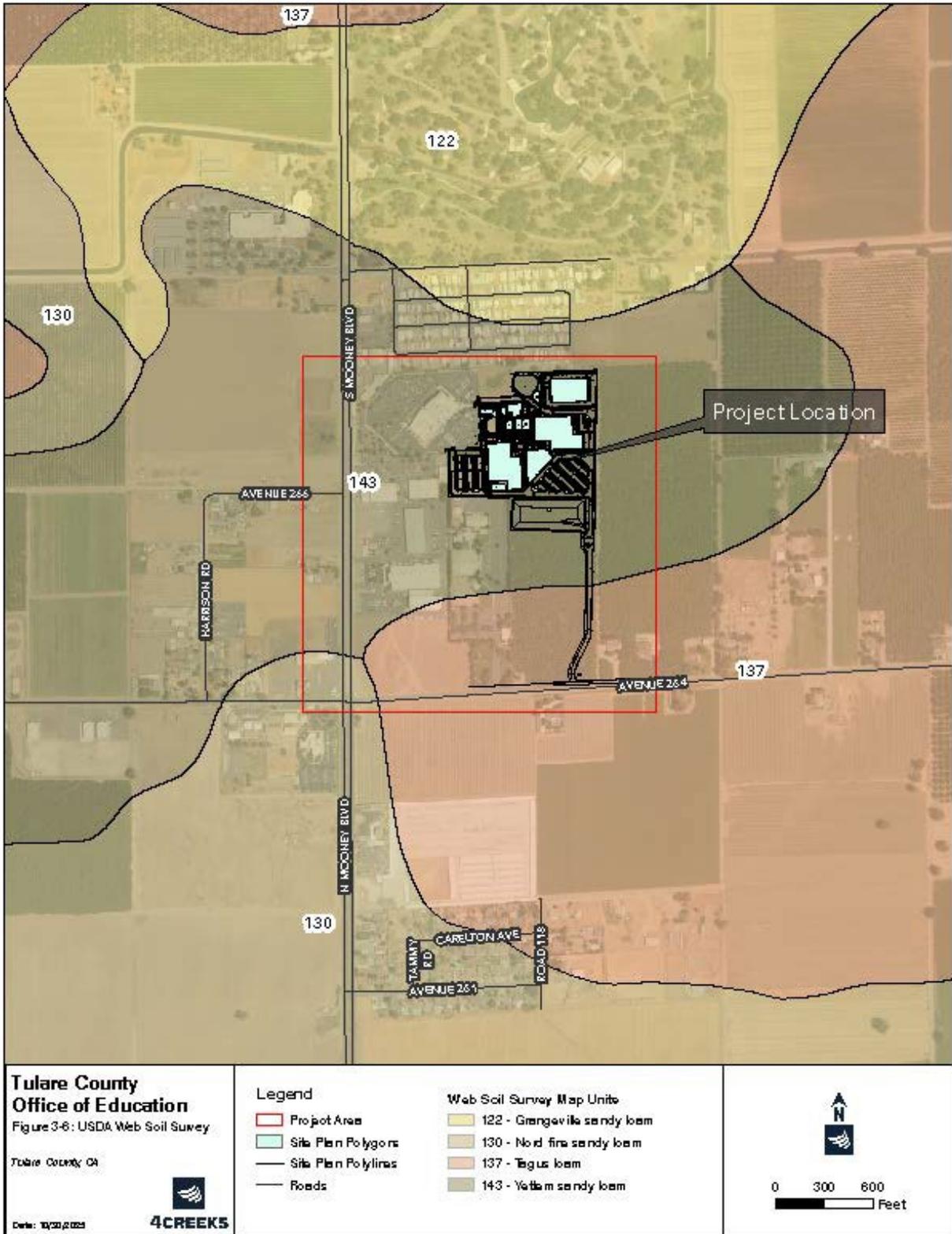
#### *City of Visalia General Plan*

None that apply to the Project. However, in regard to the annexation process, the site would be designated as Public/Institutional use.

#### *Visalia Municipal Code*

Chapter 18.04 of the Visalia Municipal Code details the Agricultural Land Preservation Program (Program) in Visalia. The agricultural land preservation program intends to establish a process for the required preservation of agricultural land through the acquisition of agricultural conservation easements or the payment of an in-lieu fee for Projects. However, as the proposed Project area is an expansion of and immediately adjacent to existing TCOE facilities and is on inactive, previously used agricultural land, this Program does not apply to the Project.

Figure 3-1. Important Farmlands Map



## Discussion

### 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 Impact:** The Project site is currently vacant property that was previously used for agriculture (walnut orchards). The entire Project site is designated as Prime Farmland, which had been used for previously *irrigated* (emphasis added) agricultural production. Implementation of the proposed Project would result in the permanent conversion of less than 30- acres of prime farmland to non-agricultural uses. The property owner has, of his/her own volition, determined that he/she no longer desires to continue the agricultural use.

As shown in Table 3-1, the Visalia 2030 General Plan (at full buildout) would allow development of up to 14,265 total acres of Important Farmland, of which 12,490 acres are Prime Farmland. Most of the planned growth would be adjacent to existing urbanized areas. The General Plan's approach would be less intrusive and disruptive to other agricultural uses countywide. The General Plan approach discourages the development of new neighborhoods or communities that would require reduce the consumption of agricultural land and limit the extension of infrastructure that could create growth-inducing impacts. Based on the information contained in Table 3-1, the Project area (rounded to 30 acres) would result in a 0.000882 percent decrease of Prime Farmland, or 0.0006951 percent decrease of total Important Farmland.

<b>FMMP Designation</b>	<b>Existing Planning Area Total (Acres)</b>	<b>Planning Area Total at General Plan Buildout (Acres)</b>	<b>Change</b>
<i>Prime Farmland</i>	33,991	21,501	-12,490 (-37%)
<i>Farmland of Statewide Importance</i>	7,353	6,954	-399 (-5%)
<i>Unique Farmland</i>	181	137	-44 (-24%)
<i>Farmland of Local Importance</i>	1,630	298	-1,333 (-82%)
<b>Important Farmland Total</b>	<b>43,155</b>	<b>28,890</b>	<b>-14,265 (-33%)</b>

Source: Visalia Planning Area General Plan EIR

As noted earlier, the location where expansion/addition of the TCOE/AOCC facilities would occur is ripe for and would also result in a reasonable expansion of an urbanized use rather than consumption of agricultural land at an alternative location. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: No Mitigation required.**

Based on the information and analysis provided herein, no mitigation would be required.

**b) Would the Project conflict with existing zoning for agricultural use, or a Williamson Act Contract?**

**Less Than Significant Impact:** The site is currently zoned for agriculture (AE-20) by the County of Tulare. The City of Visalia General Plan also designates the site as Agriculture. However, in order to meet the primary objective of the Project (i.e., expansion/addition of the existing TOCE/AOCC use), the property would be annexed by the City to accommodate Project development and receive a zoning designation of Quasi-Public and land use designation of Public Institutional, which would also facilitate connections to urban services such as potable water and sanitary sewer services. During a transition from one jurisdiction to another, zoning has the appearance of conflicting classifications when comparing the respective jurisdictions' classifications. Although the site is transitioning from an agriculture designation to an urban land use designation, it is noted that the County of Tulare Zoning Ordinance Chapter 3, Section 16 II B. allows public schools including incidental and/or accessory uses regardless of reorganization (annexation) status. Additionally, the site is located immediately adjacent to active urban land use designations and the Project represents an expansion of an existing use in the only available vacant area surrounding the existing Tulare County Office of Education (TCOE) administrative headquarters. The existing TCOE facility does not conflict with adjacent agricultural uses. Thus the expanded Project area would not conflict with new adjacent agricultural uses. The Project site is not under a Williamson Act Contract. Therefore, based on the information and analysis provided herein, there would be *a less than significant impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, no mitigation would be required.

**c) Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned timberland Production (as defined by Government Code section 51104(g))?**

**No Impact:** The Project site is not zoned for forest or timberland production as defined by PRC sections, 12220(g) and 4526 or as defined by Government Code section 51104(g). Therefore, based on the information and analysis provided herein, *no impact* would occur.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, no mitigation would be required.

**d) Would the Project result in the loss of forestland or conversion of forest land to non-forest use?**

**No Impact:** No conversion of forestland, as defined under Public Resource Code or General Code, would occur as a result of the Project. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, no mitigation would be required.

**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?**

**No Impact:** Based on both County of Tulare and City of Visalia General Plan policies; respectively, new developments (including the Project site), would be focused in and around existing communities. This would prevent new development and its accompanying infrastructure from infringing upon surrounding farmland. As noted earlier, the Project area would be annexed by the City to accommodate Project development which would also facilitate connections to urban services such as potable water and sanitary sewer services. As the Project is located immediately adjacent to the existing TCOE facilities site to the west, annexation and expansion/addition of the TCOE/AOCC facilities represents a reasonable extension of urban type development consistent with the City's General Plan rather than "leapfrogging" toward other agricultural areas that are not adjacent to urban type uses. Further, the Project does not include any features which could result in the conversion of forestland into non-forest use. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, no mitigation would be required.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, no mitigation would be required.

**Cumulative Impact: Less Than Significant Impact**

Both the Tulare County and Visalia General Plans recognize the need to accommodate future population growth which ultimately results in the conversion of vacant and/or

agricultural lands. Both General Plans contain goals/policies to minimize conversion of agricultural lands by directing development toward urbanized areas. As noted earlier, the Project would prevent new development and its accompanying infrastructure from infringing upon surrounding farmland and also facilitate connections to urban services (such as potable water and sanitary sewer services). As the Project is located immediately adjacent to the existing TCOE facilities site to the west, annexation and expansion/addition of the TCOE/AOCC facilities represents a reasonable extension of urban type development consistent with the City's General Plan rather than "leapfrogging" toward other agricultural areas that are not adjacent to urban type uses. Also as noted earlier, the Project site is surrounded by the existing TCOE Administration and Conference facilities to the west, single-family residential (mobile home park) and rural residences to the north, an institutional use (church with accessory uses), and mixed commercial uses to the southwest. Therefore, based on the information and analysis provided herein, there would be *a less than significant cumulative impact*.

## III. AIR QUALITY

<b>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the Project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Environmental Setting**

In addition to references of the Visalia General Plan and its accompanying EIR, the analysis in this section is supplemented by the Technical Memorandum Air Quality, Greenhouse Gas, and Health Risk Assessment Memorandum (AQ/GHG/HRA Memo) prepared by qualified consultants Core Environmental Consulting, Inc. (Core) and can be found in Appendix A.

Air pollution is directly related to regional topography. Topographic features can either stimulate the movement of air or restrict air movement. California is divided into regional air basins based on topographic air drainage features. The proposed Project site is within the San Joaquin Valley Air Basin, which is bordered by the Sierra Nevada Mountains to the East, Coastal Ranges to the West, and the Tehachapi Mountains to the South.

The mountain ranges surrounding the San Joaquin Valley Air Basin (SJVAB) serve to restrict air movement and prevent the dispersal of pollution. As a result, the SJVAB is highly susceptible to pollution accumulation over time. As shown in the Table 3-2, the SJVAB is in nonattainment for

several pollutant standards. The primary pollutants of concern in the San Joaquin Valley are ozone (O<sub>3</sub>) and PM<sub>10</sub>.

<b>Table 3-2. San Joaquin Valley Attainment Status.</b>		
<b>Pollutant</b>	<b>Designation/Classification</b>	
	<b>Federal Standards</b>	<b>State Standards</b>
Ozone – One hour	No Federal Standard <sup>f</sup>	Nonattainment/Severe
Ozone – Eight hour	Nonattainment/Extreme <sup>e</sup>	Nonattainment
PM 10	Attainment <sup>c</sup>	Nonattainment
PM 2.5	Nonattainment <sup>d</sup>	Nonattainment
Carbon Monoxide	Attainment/Unclassified	Attainment/Unclassified
Nitrogen Dioxide	Attainment/Unclassified	Attainment
Sulfur Dioxide	Attainment/Unclassified	Attainment
Lead (Particulate)	No Designation/Classification	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility Reducing Particles	No Federal Standard	Unclassified
Vinyl Chloride	No Federal Standard	Attainment

<sup>a</sup> See 40 CFR Part 81  
<sup>b</sup> See CCR Title 17 Sections 60200-60210  
<sup>c</sup> On September 25, 2008, EPA redesignated the San Joaquin Valley to attainment for the PM<sub>10</sub> National Ambient Air Quality Standard (NAAQS) and approved the PM<sub>10</sub> Maintenance Plan.  
<sup>d</sup> The Valley is designated nonattainment for the 1997 PM<sub>2.5</sub> NAAQS. EPA designated the Valley as nonattainment for the 2006 PM<sub>2.5</sub> NAAQS on November 13, 2009 (effective December 14, 2009).  
<sup>e</sup> Though the Valley was initially classified as serious nonattainment for the 1997 8-hour ozone standard, EPA approved Valley reclassification to extreme nonattainment in the Federal Register on May 5, 2010 (effective June 4, 2010).  
<sup>f</sup> Effective June 15, 2005, the U.S. Environmental Protection Agency (EPA) revoked the federal 1-hour ozone standard, including associated designations and classifications. EPA had previously classified the SJVAB as extreme nonattainment for this standard. EPA approved the 2004 Extreme Ozone Attainment Demonstration Plan on March 8, 2010 (effective April 7, 2010). Many applicable requirements for extreme 1-hour ozone nonattainment areas continue to apply to the SJVAB.

**Source:** SJVAPCD

## Valley Fever

Valley Fever is an illness caused by a fungus (*Coccidioides immitis* and *C. posadasii*) that grows in soils under certain conditions. Favorable conditions for the Valley Fever fungus include low rainfall, high summer temperatures, and moderate winter temperatures. In California, the counties with the highest incident of Valley Fever are Fresno, Kern and Kings counties. When soils are disturbed by wind or activities like construction and farming, Valley Fever fungal spores can become airborne. The spores present a potential health hazard when inhaled. Individuals in occupations such as construction, agriculture, and archaeology have a higher risk of exposure due to working in areas of disturbed soils which may have the Valley Fever fungus.

## **Regulatory Setting**

### **Federal**

#### *Federal Clean Air Act*

The 1977 Federal Clean Air Act (CAA) authorized the establishment of the National Ambient Air Quality Standards (NAAQS) and set deadlines for their attainment. The Clean Air Act identifies specific emission reduction goals, requires both a demonstration of reasonable further progress and an attainment demonstration, and incorporates more stringent sanctions for failure to meet interim milestones. The U.S. EPA is the federal agency charged with administering the Act and other air quality-related legislation. EPA's principal functions include setting NAAQS; establishing minimum national emission limits for major sources of pollution; and promulgating regulations. Under CAA, the NCCAB is identified as an attainment area for all pollutants.

### **State**

#### *California Clean Air Act*

California Air Resources Board coordinates and oversees both state and federal air pollution control programs in California. As part of this responsibility, California Air Resources Board monitors existing air quality, establishes California Ambient Air Quality Standards, and limits allowable emissions from vehicular sources. Regulatory authority within established air basins is provided by air pollution control and management districts, which control stationary-source and most categories of area-source emissions and develop regional air quality plans. The Project is located within the jurisdiction of the San Joaquin Valley Air Pollution Control District.

The state and federal standards for the criteria pollutants are presented in Section 8.4 of The San Joaquin Valley Unified Air Pollution Control District's 2015 "Guidance for Assessing and Mitigating Air Quality Impacts". These standards are designed to protect public health and welfare. The "primary" standards have been established to protect the public health. The "secondary" standards are intended to protect the nation's welfare and account for air pollutant effects on soils, water, visibility, materials, vegetation, and other aspects of general welfare. The U.S. EPA revoked the national 1-hour ozone standard on June 15, 2005, and the annual PM<sub>10</sub> standard on September 21, 2006, when a new PM<sub>2.5</sub> 24-hour standard was established.

### **Regional/Local**

#### *San Joaquin Valley Air Pollution Control District (SJVAPCD)*

The SJVAPCD is responsible for enforcing air quality standards in the Project area. To meet state and federal air quality objectives, the SJVAPCD adopted the following thresholds of significance for Projects as shown in Table 3-3:

<b>Table 3-3. Ambient Air Quality Standards</b>						
<b>Pollutant</b>	<b>Averaging Time</b>	<b>California Standards<sup>1</sup></b>		<b>National Standards<sup>2</sup></b>		
		<b>Concentration<sup>3</sup></b>	<b>Method<sup>4</sup></b>	<b>Primary<sup>3,5</sup></b>	<b>Secondary<sup>3,6</sup></b>	<b>Method<sup>7</sup></b>
<b>Ozone (O<sub>3</sub>)</b>	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	Ultraviolet Photometry	--	Same as Primary Standard	Ultraviolet 8 Hour Photometry
	8 Hour	0.070 ppm (137 µg/m <sup>3</sup> )		0.075 ppm (147 µg/m <sup>3</sup> )		
<b>Respirable Particulate Matter (PM<sub>10</sub>)</b>	24 Hour	50 µg/m	Gravimetric or Beta Attenuation	150 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Annual Analysis
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>		--		
<b>Fine Particulate Matter (PM<sub>2.5</sub>)</b>	24 Hour		Gravimetric or Beta Attenuation	35 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Annual Analysis
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>		15 µg/m <sup>3</sup>		
<b>Carbon Monoxide (CO)</b>	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m <sup>3</sup> )	--	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )		9 ppm (10 mg/m <sup>3</sup> )	--	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m <sup>3</sup> )		--	--	
<b>Nitrogen Dioxide (NO<sub>2</sub>)<sup>8</sup></b>	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	Gas Phase Chemiluminescence	100 ppb (188 µg/m <sup>3</sup> )	--	Gas Phase Annual Chemiluminescence
	Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )		53 ppb (100 µg/m <sup>3</sup> )	Same as Primary Standard	
<b>Sulfur Dioxide</b>	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	Ultraviolet Fluorescence	75 ppb (196 µg/m <sup>3</sup> )	--	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	--		--	0.5 ppm (1300 µg/m <sup>3</sup> )	
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (for certain areas) <sup>9</sup>	--	
	Annual Arithmetic Mean	--		0.030 ppm (for certain areas) <sup>9</sup>	--	
<b>Lead<sup>10,11</sup></b>	30 Day Average	1.5 µg/m <sup>3</sup>	Atomic Absorption	--	--	High Volume Sampler and Atomic Absorption
	Calendar Quarter	--		1.5 µg/m <sup>3</sup> (for certain areas) <sup>11</sup>	Same as Primary Standard	
	Rolling 3-Month Average	--		0.15 µg/m <sup>3</sup>		

**Table 3-3. Ambient Air Quality Standards**

Pollutant	Averaging Time	California Standards <sup>1</sup>		National Standards <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
<b>Visibility Reducing Particles<sup>12</sup></b>	8 Hour	See footnote 12	Beta Attenuation and Transmittance through Filter Tape	No National Standard		
<b>Sulfates</b>	24 Hour	25 µg/m <sup>3</sup>	Ion Chromatography			
<b>Hydrogen Sulfide</b>	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	Ultraviolet Fluorescence			
<b>Vinyl Chloride<sup>10</sup></b>	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	Gas Chromatography			

- California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m<sup>3</sup> is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
- Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
- National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
- To attain the 1-hour national standard, the 3-year average of the annual 98<sup>th</sup> percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national standards are in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standards of 53 ppb and 100 ppb are identical to 0.053 ppm and 0.100 ppm, respectively.
- On June 2, 2010, a new 1-hour SO<sub>2</sub> standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99<sup>th</sup> percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO<sub>2</sub> national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
- The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m<sup>3</sup> as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

**Table 3-3. Ambient Air Quality Standards**

Pollutant	Averaging Time	California Standards <sup>1</sup>		National Standards <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
12. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.						
Source: SJVAPCD						

The following SJVAPCD rules and regulations may apply to the proposed Project:

- **Rule 3135:** Dust Control Plan Fee. All Projects which include construction, demolition, excavation, extraction, and/or other earth moving activities as defined by Regulation VIII (Described below) are required to submit a Dust Control Plan and required fees to mitigate impacts related to dust.
- **Rule 4101:** Visible Emissions. District Rule 4101 prohibits visible emissions of air contaminants that are dark in color and/or have the potential to obstruct visibility.
- **Rule 4601:** Architectural Coatings. This rule specifies architectural coatings storage, cleanup, and labeling requirements.
- **Rule 4641:** Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations. This rule limits VOC emissions by restricting the application and manufacturing of certain types of asphalt for paving and maintenance operations.
- **Rule 4702:** Internal Combustion Engines. This rule applies to any internal combustion engine rated at 25 brake horsepower or greater.
- **Rule 9410:** The purpose of this rule is reduce vehicle miles traveled (VMT) from private vehicles used by employees to commute to and from their worksites to reduce emissions of oxides of nitrogen (NO<sub>x</sub>), volatile organic compounds (VOC) and particulate matter (PM). The trip reduction and administrative requirements of this rule apply to each employer in the San Joaquin Valley Air Basin with at least 100 Eligible Employees at a worksite for at least 16 consecutive weeks during the employer's previous fiscal year.
- **Rule 9510:** Indirect Source Review (ISR). This rule reduces the impact PM<sub>10</sub> and NO<sub>x</sub> emissions from growth on the SJVB. This rule places application and emission reduction requirements on applicable development Projects in order to reduce emissions through onsite mitigation, offsite SJVAPCD administered Projects, or a combination of the two. The Project applicant will required to submit an Air Impact Assessment (AIA) application in accordance with Rule 9510's requirements.
- **Regulation VIII:** Fugitive PM<sub>10</sub> Prohibitions. Regulation VIII is composed of eight rules which together aim to limit PM<sub>10</sub> emissions by reducing fugitive dust. These rules contain required management practices to limit PM<sub>10</sub> emissions during construction, demolition, excavation, extraction, and/or other earth moving activities.

## City of Visalia General Plan

The 2030 General Plan includes the policies related to air quality that correlate to the proposed Project:

- AQ-P-2: Require use of Best Management Practices (BMPs) to reduce particulate emission as a condition of approval for all subdivisions, development plans and grading permits, in conformance with the San Joaquin Valley Air Pollution Control District Fugitive Dust Rule.
- AQ-P-9: Continue to mitigate short-term construction impacts and long-term stationary source impacts on air quality on a case-by-case basis and continue to assess air quality impacts through environmental review. Require developers to implement Best Management Practices (BMPs) to reduce air pollutant emissions associated with the construction and operation of development Projects.

## **Discussion**

### **a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?**

**Less than Significant Impact:** The SJVAPCD drafted a series of State Implementation Plans (SIP) for the criteria pollutants that are of concern for the San Joaquin Valley Air Basin. The integration of multiple SIPs for each criteria pollutant collectively form the air quality plan for the San Joaquin Valley Air Basin. The most recent SIP is the “2024 Plan for the 2012 PM 2.5 Standard”, which focuses on meeting the annual PM 2.5 standard of 12 micrograms/cubic meters originally set in 2012. This SIP includes measures to reduce fine particulate matter emissions and improve air quality by the year 2030. The SJVAPCD has established thresholds in the adopted SIPs and other air quality plans prepared by the Air District. These thresholds are depicted in Table 3-4, with Tables 3-5, and 3-6 also showing the results for construction- and operation-related emissions. Criteria for determining consistency with the established standards are whether or not the Project’s estimated emissions exceed those thresholds established by the Air District. As long as the Project construction and operational emissions do not exceed the thresholds, the Project will not result in new air violations, delay the timely attainment of air quality standards, or result in increased severity of an existing air quality violation.

Qualified consultants Core provided the following narrative as contained in the AQ/GHG/HRA Memorandum.

#### “Criteria Pollutants

- Criteria pollutant emissions were estimated using the latest version of CalEEMod. Land uses were modeled as follows:
- Conference room – government office building

- Classrooms – junior community college
- Warehouse – unrefrigerated warehouse, no rail
- Parking – parking lot
- Driveways – other asphalt areas
- Stormwater basin, concrete – other non-asphalt area

The operational characteristics of the uses selected for the conference room, classrooms, and warehouse would overestimate the actual vehicle trips and resource usages of the Project, but were selected as health-conservative opinions that most closely match based on the CalEEMod User Guide. Areas were estimated from the attached Site Plan.

The CalEEMod results are included as Attachment 2 [of the AQ/GHG/HRA Memorandum] and summarized in the table below, along with comparisons to the SJVAPCD thresholds of significance." "A shown in Tale above [Table 3 5 of this document] Project construction and operational emissions of criteria pollutants not exceed SJVAPCD thresholds of significance. (AQ/GHG/HRA Memorandum, pages 2-3).

<b>Table 3-4. Criteria Pollutant Emissions Compared to SJVAPCD Thresholds of Significance (tons per year)</b>						
<b>CONSTRUCTION</b>	<b>CO</b>	<b>NOx</b>	<b>ROG</b>	<b>SOx</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Construction Emissions (mitigated, worst year)	2.1	1.6	0.40	<0.005	0.28	0.15
SJVAPCD Thresholds of Significance	100	10	27	10	15	15
<b>Exceeds Threshold?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
<b>OPERATION</b>	<b>CO</b>	<b>NOx</b>	<b>ROG</b>	<b>SOx</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Operational Emissions	10	1.7	2.0	0.03	2.3	0.62
SJVAPCD Thresholds of Significance	100	10	27	10	15	15
<b>Exceeds?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
<i>CO = carbon monoxide</i> <i>NOx = oxides of nitrogen</i> <i>ROG = reactive organic gases</i> <i>SOx = oxides of sulfur; sulfur dioxide (SO<sub>2</sub>) is the primary constituent and equivalent</i> <i>PM<sub>10</sub> = particulate matter with an aerodynamic diameter less than 10 microns</i> <i>PM<sub>2.5</sub> = particulate matter with an aerodynamic diameter less than 2.5 microns.</i>						

#### "Ambient Air Quality

The exposure of sensitive receptors to substantial pollutant concentrations can occur if the Project would result in localized exceedances of National or California Ambient Air Quality Standards (NAAQS/CAAQS), or if Project emissions of Toxic Air Contaminants (TAC) would exceed SJVAPCD thresholds of significance (discussed in the HRA section below). SJVAPCD

has determined that, if maximum Project criteria pollutant emissions are below 100 pounds per day for each pollutant, it can be concluded that the Project would not result in a localized exceedance of NAAQS or CAAQS and no further Ambient Air Quality Analysis (AAQA) is required.

Following the SJVAPCD methodology presented in Application Review Policies (APR) 2030 (Project Ambient Air Quality Analysis Applicability Determination under CEQA)<sup>1</sup>, the Project was first assessed to determine whether it would be subject to Indirect Source Review (ISR). The Project site is over the square footage thresholds listed in Rule 9510 and would therefore be subject. Maximum daily criteria pollutants resulting from construction and operation were then calculated as described in the Criteria Pollutants section above [in the AQ/GHG/HRA Memorandum].

Maximum daily criteria pollutant emissions are compared to the 100-lb-per-day AAQA applicability threshold in the table below [Table 3-5].

<b>Table 3-5 Maximum Daily Criteria Pollutant Emissions Compared to SJVAPCD AAQA Thresholds (lb/day)</b>						
<b>CONSTRUCTION</b>	<b>CO</b>	<b>NOx</b>	<b>ROG</b>	<b>SOx</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Construction Emissions (max daily, worst year, worst season)	29	29	38	0.05	21	11
<b>Exceeds 100lb/day?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
<b>OPERATION</b>	<b>CO</b>	<b>NOx</b>	<b>ROG</b>	<b>SOx</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Operational Emissions (max daily, worst season)	94	13	15	02.1	18	4.7
<b>Exceeds 100 lb/day?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
<i>CO = carbon monoxide</i> <i>NOx = oxides of nitrogen</i> <i>ROG = reactive organic gases</i> <i>SOx = oxides of sulfur; sulfur dioxide (SO<sub>2</sub>) is the primary constituent and essentially equivalent</i> <i>PM<sub>10</sub> = particulate matter with an aerodynamic diameter less than 10 microns</i> <i>PM<sub>2.5</sub> = particulate matter with an aerodynamic diameter less than 2.5 microns.</i>						

It is worth noting that, although the worst daily operational CO emissions are estimated to come near the 100 pound per day threshold, the emissions are an overestimation compared to actual operational characteristics and, more important, an AAQA is only required to consider on-site emissions and off-site emissions within ¼ mile of the project boundary. Since most of the emissions are from vehicle trips, with trip lengths averaging over 9 miles, the onsite CO emissions for consideration under an AAQA would be far lower.

As shown in the table above, none of the criteria pollutants would exceed 100 pounds per day, during construction or operation. Therefore, no further AAQA is required and the Project would not expose sensitive receptors to substantial pollutant concentrations by resulting in a localized exceedance of NAAQS or CAAQS. With respect to the numerical threshold

established by SJVAPCD, the associated impact would be less than significant. No mitigation is required outside of compliance with existing regulations. As discussed in the Criteria Pollutants section above [as shown in the AQ/GHG/HRA Memorandum], emissions are expected to be further reduced with implementation of all State, regional, and local measures." (AQ/GHG/HRA Memorandum, pages 7-8).

Since the Project is not anticipated to exceed any SJVAPCD thresholds of significance, the Project will not conflict with or delay the implementation of the SJVAPCD attainment/implementation plans for criteria pollutants. Therefore, based on the AQ/GHG/HRA Memorandum prepared by qualified consultants Core, and the information and analysis contained herein, the Project would result in a *less than significant impact*.

**Mitigation Measures: None required.**

Based on the AQ/GHG/HRA Memorandum prepared by qualified consultants Core, and the information and analysis provided herein, *no Mitigation Measures would be required*.

**b) Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?**

**Less Than Significant Impact:** The SJVAPCD is responsible for bringing air quality in the Tulare Planning Area into compliance with federal and state air quality standards. The significance thresholds and rules developed by the SJVAPCD are designed to prevent Projects from violating air quality standards or significantly contributing to existing air quality violations. As discussed earlier, neither construction-related emissions nor operation-related emissions will exceed thresholds established by the SJVAPCD. The Project will comply with all applicable SJVAPCD rules and regulations, which will further reduce the potential for any significant impacts related to air quality as a result of Project implementation. Because these thresholds and regulations are designed to achieve and/or maintain federal and state air quality standards, and the Project is compliant with these thresholds and regulations, the Project will not violate an air quality standard or significantly contribute to an existing air quality violation. Also see Item III a). Therefore, based on the AQ/GHG/HRA memorandum prepared by qualified consultants Core, and the information and analysis contained herein, the Project would result in a *less than significant impact*.

**Mitigation Measures: None required.**

Based on the AQ/GHG/HRA memorandum prepared by qualified consultants Core, and the information and analysis provided herein, *no mitigation measures would be required*.

**c) Would the Project expose sensitive receptors to substantial pollutant concentrations?**

**Less than Significant Impact:** Qualified consultants Core provided the following narrative as contained in the AQ/GHG/HRA memorandum. It is noted that the footnote references are not included herein but are included in the AQ/GHG/HRA memorandum

#### “Health Risk Assessment

The Health Risk Assessment (HRA) in this Technical Memo was prepared in accordance with the guidelines outlined in the Office of Environmental Health Hazard Assessment (OEHHA) Guidance Manual for Preparation of Health Risk Assessments<sup>2</sup>; SJVAPCD Policy APR 1906 – Framework for Performing Health Risk Assessments<sup>3</sup> and Guidance for Air Dispersion Modeling<sup>4</sup>. The reader is encouraged to reference those sources, along with the SJVAPCD Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI)<sup>5</sup> for in-depth discussions regarding setting, regulatory background, pollutant descriptions, and HRA methodologies, as this Technical Memo includes only a critical summary of the project-specific HRA methodology and results.

The primary Toxic Air Contaminants (TAC) of concern include diesel particulate matter (DPM) emissions from diesel-fueled construction vehicle and equipment use. Operation would not include any substantial sources of DPM or any other substantial sources of TAC

The United States Environmental Protection Agency’s (U.S. EPA) American Meteorological Society/EPA Regulatory Model (AERMOD) air dispersion model was used to model the annual downwind air concentration at nearby receptors, based on a normalized emission rate of one gram per second. Meteorological data was obtained from SJVAPCD (Visalia met site); CARB and SJVAPCD recommended modeling parameters were used throughout. Construction emissions were modeled as an area source with dimensions matching the Project site. Discrete worker and residential receptors were added based on business and residence locations shown on the imported Google Earth base map; a total of 36 receptors were added for a representative analysis. Terrain was added using the built in WebGIS tool.

Construction DPM emissions were estimated using CalEEMod, as described in the Criteria Pollutants section above. SJVAPCD considers PM10 exhaust to be a reasonable surrogate for DPM, and the maximum (worst year) annual emissions were used for subsequent calculations.

Normalized downwind air concentrations for each receptor (modeled in the step above) were imported into the CARB Hotspots Analysis and Reporting Program (HARP2) Air Dispersion Modeling and Risk Tool (ADMRT) and combined with the toxic emissions data to estimate the ground level concentrations of TAC at each receptor. A separate run was performed for worker risk because the highest risk receptor would be at the existing TCOE facilities just west of the site. The exposure duration was set to two years, rounded up from the 1.3 year construction timeline. The construction risk calculations included the area source described in the modeling above and annual emissions of DPM. OEHHA has not

established a Reference Exposure Level (REL) for 8-hour chronic, or acute health risk from DPM. Thus, the 8-hour chronic and acute HI are not calculated, except in unusual situations such as when a sensitive receptor is located directly above the emission release point (e.g., on a hillside or in a multistory apartment building).

Results of the AERMOD modeling and ADMRT calculations are included as Attachment 3 [of the AQ/GHG/HRA Study], along with a map of receptors. Modeling input and output files will be made available to reviewing agencies upon request. The highest risks calculated for each scenario are presented in the table below, along with comparisons to SJVAPCD thresholds of significance. All results are the maximally exposed individual (MEI) for each scenario.

<b>Table 3-6 HRA Results Compared to SJVAPCD Thresholds of Significance</b>		
RISK	CARCINOGEN (risk in one million)	CHRONIC HAZARD INDEX
Construction Health Risk	15.7 (Receptor 6)	0.0092 (Receptor 6)
<b>Thresholds of Significance</b>	<b>20</b>	<b>1</b>
<i>No HI was calculated for 8- hour Chronic or Acute risk because OEHHA has not established REL. (California Air Resources Board, 2024)</i>		

As shown in the table above [Table 3-7], the highest risks occurred at Receptor 6, a residence located adjacent to the north side of the Project site. Initial calculations indicated that the highest risks could occur at Receptor 28; however, that receptor location is an existing TCOE facility adjacent to the west side of the Project site. Risks were recalculated for Receptor 28 as a worker and the results were substantially lower than the risks to residential Receptor 6 and well under the SJVAPCD thresholds of significance.

Calculated risks would not exceed SJVAPCD thresholds of significance. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations resulting from TAC emissions. Impacts would be less than significant.

As discussed in the Criteria Pollutants section above, emissions would be further reduced with implementation of all State, regional, and local measures.” (AQ/GHG/HRA Memorandum, pages 4-5).

Therefore, the release of toxic air contaminants (TACs) would be limited to short-term, temporary, and intermittent occurrences during each construction phase to impact sensitive receptors. As such, based on the AQ/GHG/HRA Memorandum prepared by qualified consultants Core, and the information and analysis contained herein, there would be a *less than significant impact*.

**Mitigation Measures: None required.**

Based on the AQ/GHG/HRA Memorandum prepared by qualified consultants Core, and the information and analysis provided herein, *no mitigation measures would be required.*

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

**Less Than Significant Impact:**

Some typical construction-related odors would be generated during Project construction-related activities. As noted in Item III c), the Project is adjacent to sensitive receptors to the east, south, and southeast which may be temporarily affected by such odors. The Project may create objectionable odors, but the odors would be short-term, temporary, and intermittent and would not affect a substantial number of people during construction-related activities. Additionally, the proposed Project would not include any odor sources identified in Table 6 of the SJVAPCD's Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI). The GAMAQI also notes, "Because of the subjective nature of odor impacts and the lack of quantitative or formulaic methodologies, the significance determination of potential odor impacts should be considered on a case-by-case basis." (see GAMAQI, page 102; accessed at: <https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf>).

The operational phase will be public institutional uses, as such, there would be no odors that would result in nuisance or harmful impacts. As such, based on the information and analysis provided herein, the Project would result in a *less than significant impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, no mitigation would be required.

**Mitigation Measure(s): None required.**

Based on the AQ/GHG/HRA Memorandum prepared by qualified consultants Core, and the information and analysis provided herein, *no mitigation measures would be required.*

**Cumulative Impact: Less than Significant**

Both the Tulare County and Visalia General Plans environmental impact reports (EIR) have accounted for population growth, and subsequent development to accommodate that growth, and have determined air quality impacts are unavoidable. Individually, projects may not exceed any air quality thresholds on a regional level; however, when combined with similar nearby projects, an exceedance could occur on a local level. As both the County's and City's General Plans anticipated and have accounted for all types of land use development over time, the Project would be consistent with the County's and City's

General Plans EIRs regarding the Air Quality resource. The Project would result in the development of expanded/additional Tulare County Office of Education administrative, warehousing uses approximately 149,200 square feet (108,000 square feet of office and conference room space, three classrooms with a training kitchen totaling 6,200 square feet, and approximately 35,000 square feet of warehouse space) on approximately 28 acres and provides benefits such as planned growth/development in an urbanized area and minimizes urban sprawl as the Project is currently directly adjacent to existing residential (mobile home park) and commercial mixed use development. Individually, the Project would not conflict with or obstruct implementation of the applicable air quality plan; it would not result in a cumulatively considerable net increase of any criteria pollutant; it would not the Project expose sensitive receptors to substantial pollutant concentrations as demonstrated in the HRA (see Appendix A); and it would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Therefore, based on the AQ/GHG/HRA Memorandum prepared by qualified consultants Core, and the information and analysis provided herein, the Project would result in a *less than significant cumulative impact*.

IV. BIOLOGICAL RESOURCES

<b>Would the Project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish & Game or U.S. fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through director removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

or other approved local, regional, or state habitat conservation plan?				
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In addition to references of the Visalia General Plan and its accompanying EIR, the analysis in this section is supplemented by a Biological Resource Evaluation (BRE) prepared by qualified consultants Colibri Ecological Consulting, LLC (Colibri), which can be found in Appendix B.

### **Environmental Setting**

The Project site is in the western portion of the Visalia Planning Area within the lower San Joaquin Valley, in the Central Valley of California. The Central Valley is bordered by the Sierra Nevada Mountain Range to the east and the Coast Ranges to the west. Like most of California, Visalia is considered a Mediterranean climate.

Warm, dry summers are followed by cool, moist winters. Summer temperatures often reach above 90 degrees Fahrenheit, and the humidity is relatively low. Winter temperatures are often below 60 degrees Fahrenheit during the day and rarely exceed 70 degrees. On average, Visalia receives approximately 11 inches of precipitation in the form of rainfall yearly, most of which occurs between October and March.

### **Site Description**

The topography of the Project Area is relatively flat. The property is currently vacant that was previously used for agriculture (walnut orchards). The proposed Project site is in an urban and agricultural interface environment in an unincorporated area in the County of Tulare adjacent to the southern part of the City of Visalia. The proposed Project site is bound by the existing TCOE Administration and Conference facilities to the west, walnut orchard to the east, single-family residential (mobile home park) and scattered rural residences to the north, an institutional use (church with accessory uses), and mixed commercial uses to the southwest.

The former walnut orchard could have provided limited nesting and foraging habitat for birds and wildlife; however, the value of this habitat type would have been relatively low due to the ongoing disturbance from agricultural operations. Also, as indicated in the BRE and summarized in Table 3-7, no special status species were sighted during transects of the Project site (or within a 50' buffer of the site),

### **Methodology**

As indicated in the BRE (see Appendix B), prepared by qualified consultants Colibri Ecological Consulting, LLC (Calibri), as a framework for the evaluation and reconnaissance survey, Colibri Ecological Consulting, LLC obtained a U.S. Fish and Wildlife Service (USFWS 2025a, Appendix A of the BRE) species list for the Project. As indicated in the BRE (at page 14), "In addition, we searched the California Natural Diversity Database (CNDDDB, Appendix C [of the BRE]) and the

CNPS Inventory of Rare and Endangered Plants (CNPS, Appendix C [of the BRE]) for records of special-status plant and animal species from the Project site. Regional lists of special-status species were compiled using CNDDDB and CNPS database searches confined to the Visalia 7.5-minute United States Geological Survey (USGS) topographic quadrangle, which encompasses the Project site, and the eight surrounding quadrangles (Cairns Corner, Exeter, Goshen, Ivanhoe, Monson, Paige, Traver, and Tulare). A local list of special-status species was compiled using CNDDDB records from within 5 miles of the Project site. Species that lacked a CEQA-recognized special-status designation by state or federal regulatory agencies or public interest groups were omitted from the final list. Species for which the Project site does not provide habitat were eliminated from further consideration. Aerial imagery from Google Earth (Google 2025) and other sources was also reviewed, USGS topographic maps, the Web Soil Survey (NRCS 2025), the National Wetlands Inventory (USFWS 2025b), and relevant literature.”

Also as indicated in the BRE (at page 17), “The USFWS species list for the Project included seven species listed as threatened, endangered, or proposed for listing under the FESA (USFWS 2025a, Table 1, Appendix A [Appendix B and also Table 3-7 of the MND]). None of those species could occur on or near the Project site due to the lack of habitat or because the Project site is outside the known range of species (Table 1). As stated in the species list, the Project site occurs outside any proposed or designated USFWS critical habitat (USFWS 2024a, Appendix A [of the BRE] and part of Appendix B of this MND).

Searching the CNDDDB for records of special-status species from the Visalia 7.5- minute USGS topographic quadrangle and the eight surrounding quadrangles produced 220 records of 42 species (Appendix B [of the BRE, Appendix B of the MND]) and four sensitive natural communities. Of the 42 species, six were not considered further because they are not CEQA-recognized as special-status species by state or federal regulatory agencies or public interest groups or are considered extirpated in California (Appendix B [of the BRE, Appendix B of the MND]). Of the remaining 36 species, 20 are known from within 5 miles of the Project site ([Table 1, Figure 4 [of the BRE, Table 3-7 in the MND]). None of the species or sensitive natural communities identified in the nine-quad search could occur on or near the Project site due to lack of habitat (Table 1 [of the BRE, Table 3-7 in the MND]).

Searching the CNPS inventory of rare and endangered plants of California yielded 21 species (CNPS 2025, Appendix C [of the BRE, Appendix C in the MND]), 18 of which have a CRPR of 1 or 2 and four of which are also state or federally listed (Table 1 [of the BRE, Table 3-7 in the MND]). Of those 18 plant species, none could occur on or near the Project site due to the lack of habitat (Table 1 [of the BRE, Table 3-7 in the MND]).”

<b>Table 3-7. Special Status Species Potentially on Project Site</b>			
<b>Species Name</b>	<b>*Listing Status</b>	<b>Habitat Requirements</b>	<b>Potential to Occur<sup>2</sup></b>
<b>Federally and State-Listed Endangered or Threatened Species</b>			

**Table 3-7. Special Status Species Potentially on Project Site**

<b>Species Name</b>	<b>*Listing Status</b>	<b>Habitat Requirements</b>	<b>Potential to Occur<sup>2</sup></b>
California jewelflower ( <i>Caulanthus californicus</i> )	FE/SE/IB.1	Sandy soils in shadscale scrub, valley and foothill grassland, and pinyon-juniper woodland below 3280 feet elevation.	<b>None.</b> Habitat lacking; the Project site lacked shadscale scrub, natural grassland, and pinyon-juniper woodland.
Hoover's spurge <sup>3</sup> ( <i>Chamaesyce hooveri</i> )	FT/IB.1	Vernal pools on volcanic mudflow or clay substrate at 82-427 feet elevation.	<b>None.</b> Habitat lacking; no vernal pools were in the survey area.
San Joaquin adobe sunburst ( <i>Pseudobahia peirsonii</i> )	FT/SE/IB.1	Heavy clay soils in valley and foothill grassland and cismontane woodland at 295- 2625 feet elevation.	<b>None.</b> Habitat lacking; the Project site lacked heavy clay soils.
San Joaquin Valley Orcutt grass <sup>3</sup> ( <i>Orcuttia inaequalis</i> )	FT/SE/IB.1	Vernal pools at or below 2700 feet elevation.	<b>None.</b> Habitat lacking; no vernal pools were in the survey area.
Crotch bumble bee <sup>3</sup> ( <i>Bombus crotchii</i> )	SCE	Grassland and scrub areas with abandoned rodent burrows for nesting.	<b>None.</b> Habitat lacking; no grassland or scrub areas were present in the survey area.
Monarch California overwintering population ( <i>Danaus plexippus</i> )	FPT	Groves of trees within 1.5 miles of the ocean that produce suitable micro-climates for overwintering such as high humidity, dappled sunlight, access to water and nectar, and protection from wind.	<b>None.</b> Habitat lacking; the Project site is not within 1.5 miles of the ocean.
Valley elderberry longhorn beetle ( <i>Desmocerus Californicus dimorphus</i> )	FT	Elderberry ( <i>Sambucus</i> sp.) plants having basal stem diameter greater than 1" at ground level.	<b>None.</b> Habitat lacking; no elderberry shrubs were found in the survey area, and the survey area is outside the currently recognized range of the species.
Vernal pool fairy Shrimp <sup>3</sup> ( <i>Branchinecta lynchi</i> )	FT	Vernal pools; some artificial depressions, ditches, stock ponds, vernal swales, ephemeral drainages, and seasonal wetlands.	<b>None.</b> Habitat lacking; no vernal pools or other suitable aquatic features were in the survey area; the irrigation pond on the Project site is too frequently inundated and likely too contaminated with

<b>Table 3-7. Special Status Species Potentially on Project Site</b>			
<b>Species Name</b>	<b>*Listing Status</b>	<b>Habitat Requirements</b>	<b>Potential to Occur<sup>2</sup></b>
			fertilizer to provide habitat for this species.
Vernal pool tadpole shrimp ( <i>Lepidurus packardii</i> )	FE	Vernal pools, clay flats, alkaline pools, and ephemeral stock tanks.	<b>None.</b> Habitat lacking; the Project site lacked vernal pools or other potential habitat for this species.
California tiger salamander—central California Distinct Population Segment <sup>3</sup> ( <i>Ambystoma californiense</i> )	FT/ST	Vernal pools or seasonal ponds for breeding; small mammal burrows for upland refugia in natural grasslands.	<b>None.</b> Habitat lacking; the irrigation pond along the northern boundary of the Project site is likely too contaminated with fertilizer to support the species. No upland habitat was present on or near the project site.
Western spadefoot <sup>3</sup> ( <i>Spea hammondi</i> )	FPT;SSSC	Open areas with sandy or gravelly soil that allow rain pools to gather for breeding.	<b>None.</b> Habitat lacking; no vernal pool or other potential habitat was present in the survey area.
Blunt-nosed leopard Lizard ( <i>Gambelia Sila</i> )	FE, SE, FP	Upland scrub and sparsely vegetated grassland with small mammal burrows.	<b>None.</b> Habitat lacking; the Project site lacked grassland and upland scrub. The Project site is also outside the current known range of this species.
Northwestern pond Turtle <sup>3</sup> ( <i>Actinemys marmorata</i> )	FPT;SSSC	Ponds, rivers, marshes, streams, and irrigation ditches, usually with aquatic vegetation. Basking sites and suitable upland areas for egg laying.	<b>None.</b> Habitat lacking; the irrigation pond on the Project site is too small to provide habitat for this species. The Project site also lacks basking sites and upland habitat.
Burrowing owl <sup>3</sup> ( <i>Athene cunicularia</i> )	SC	Grassland and upland scrub with friable soil; open areas in agricultural, developed, and disturbed lands with ground squirrel burrows.	<b>None.</b> Habitat lacking; the Project site lacked grassland or upland scrub with friable soil or suitable open areas.
Swainson's hawk <sup>3</sup> ( <i>Buteo swainsoni</i> )	ST	Large trees for nesting with adjacent grasslands, alfalfa fields, or grain fields for foraging.	<b>Low.</b> Potential nest trees were in the 0.5-mile survey area. Foraging habitat was sparsely distributed throughout the 0.5-mile survey area, and the surrounding land cover was

<b>Table 3-7. Special Status Species Potentially on Project Site</b>			
<b>Species Name</b>	<b>*Listing Status</b>	<b>Habitat Requirements</b>	<b>Potential to Occur<sup>2</sup></b>
			dominated by incompatible orchards.
Tricolored blackbird ( <i>Agelaius tricolor</i> )	ST/SSSC	Freshwater emergent wetlands, some agricultural fields, grassland, and silage fields near dairies.	<b>None.</b> Habitat lacking; the Project site lacked freshwater emergent wetlands, agricultural fields, grassland, and silage fields.
Western yellow-billed cuckoo <sup>3</sup> ( <i>Agelaius tricolor</i> )	FT/SE	Riparian forests with willow and cottonwood trees and an understory of blackberry, nettles, or wild grape.	<b>None.</b> Habitat lacking; the Project site lacked riparian areas.
Buena Vista Lake ornate shrew ( <i>Sorex ornatus relictus</i> )	FE, SSSC	Moist riparian, wetlands, grasslands, and upland scrub with abundant leaf litter and dense herbaceous cover	<b>None.</b> The Project site is outside the current known range of this species.
San Joaquin kit fox <sup>3</sup> ( <i>Vulpes macrotis mutica</i> )	FE/ST	Grassland and upland scrub and fallowed agricultural lands adjacent to natural grasslands or upland scrub.	<b>None.</b> Habitat lacking; the Project site is outside the current known local range of this species.
Tipton kangaroo rat ( <i>Dipodomys nitratoides nitratoides</i> )	FE/SE	Grassland and upland scrub with sparse to moderate shrub cover and saline soils; also fallowed agricultural fields adjacent to natural grasslands or upland scrub.	<b>None.</b> Habitat lacking; the Project site has been routinely disked.
<b>State Species of Special Concern</b>			
Northern leopard frog ( <i>Lithobates pipiens</i> )	SSSC	Shoreline cover, submerged, and emergent aquatic vegetation near permanent or semipermanent water east of Sierra Nevada Cascade Crest.	<b>None.</b> Habitat lacking; no permanent or semipermanent water features were in the survey area. The Project site also is outside the current known range of this species.
Northern California legless lizard <sup>3</sup>	SSSC	Moist, warm, loose soil with some plant cover in	<b>None.</b> Habitat lacking; no moist soils under sparse

<b>Table 3-7. Special Status Species Potentially on Project Site</b>			
<b>Species Name</b>	<b>*Listing Status</b>	<b>Habitat Requirements</b>	<b>Potential to Occur<sup>2</sup></b>
<i>Anniella pulchra</i>		sparsely vegetated coastal dune, chaparral, pine-oak woodland, desert scrub, and stream terraces.	vegetation were present on or near the Project site.
Loggerhead shrike ( <i>Lanius ludovicianus</i> )	SSSC	Nests in dense shrubs with open country for hunting in a variety of habitats.	<b>None.</b> Habitat lacking; no nesting shrubs or open country for hunting was present in the survey area.
American badger ( <i>Taxidea taxus</i> )	SSSC	Variable. Open, dry areas with friable soils and small mammal populations in grassland, conifer forest, and desert.	<b>None.</b> Habitat lacking; the survey area was too developed to support this species.
Pallid bat ( <i>Antrozous pallidus</i> )	SSSC	Rock crevices, caves, bridges, buildings, and tree hollows in rocky mountainous areas and sparsely vegetated grassland near water.	<b>Low.</b> Large trees along the perimeter of the Project site may provide roosting habitat for this species.
Western mastiff bat ( <i>Eumops perotis californicus</i> )	SSSC	Cliff faces, high buildings, trees, and tunnels near open, arid areas.	<b>Low.</b> Large trees along the perimeter of the Project site may provide roosting habitat for this species.
<b>California Rare Plants</b>			
Alkali sink goldfields <sup>3</sup> ( <i>Lasthenia chrysantha</i> )	1B.1	Vernal pools and wet saline flats below 320 feet elevation.	<b>None.</b> Habitat lacking; no vernal pool or wet saline flat habitats were present in the survey area.
Brittlescale <sup>3</sup> ( <i>Atriplex depressa</i> )	1B.2	Alkaline clay soils in valley and foothill grassland, meadows, seeps, playas and in Chenopod scrub below 1050 feet.	<b>None.</b> Habitat lacking; the Project site lacks alkaline clay soils.
California alkali Grass <sup>3</sup> ( <i>Puccinellia simplex</i> )	1B.2	Saline flats and mineral springs below 3000 feet elevation.	<b>None.</b> Habitat lacking; the survey area lacked saline flats and mineral springs.
California satintail <sup>3</sup> ( <i>Imperata brevifolia</i> )	2B.1	Mesic sites, alkali seeps, and riparian areas in chaparral, scrub, meadows and seeps,	<b>None.</b> Habitat lacking; no mesic sites, alkali seeps, or riparian areas in chaparral scrub, meadows and seeps,

<b>Table 3-7. Special Status Species Potentially on Project Site</b>			
<b>Species Name</b>	<b>*Listing Status</b>	<b>Habitat Requirements</b>	<b>Potential to Occur<sup>2</sup></b>
		and wetland communities below 3985 feet elevation.	or wetland communities were present in the survey area.
Coulter's goldfields ( <i>Lasthenia glabrata</i> ssp. <i>coulteri</i> )	1B.1	Saltmarsh, playas, and vernal pools below 4000 feet elevation.	<b>None.</b> Habitat lacking; no suitable aquatic features for this species were present on the Project site.
Earlimart orache ( <i>Atriplex cordulata</i> var. <i>erecticaulis</i> )	1B.2	Saline or alkaline soils in valley and foothill grassland below 230 feet elevation.	<b>None.</b> Habitat lacking; the Project site is above the known elevational range of this species.
Heartscale <sup>3</sup> ( <i>Atriplex cordulata</i> var. <i>cordulata</i> )	1B.2	Saline or alkaline soils in grassland, meadows and seeps, and chenopod scrub communities below 230 feet elevation.	<b>None.</b> Habitat lacking; the Project site is above the known elevational range of this species.
Lesser saltscale <sup>3</sup> ( <i>Atriplex minuscula</i> )	1B.1	Sandy, alkaline soils in chenopod scrub, playa, and grassland in the San Joaquin Valley below 328feet elevation.	<b>None.</b> Habitat lacking; the survey area lacked sandy, alkaline soils in chenopod scrub, playa, or grassland.
Recurved larkspur ( <i>Delphinium recurvatum</i> )	1B.2	Poorly drained, fine, alkaline soils in grassland and saltbush scrub at 98–1969 feet elevation.	<b>None.</b> Habitat lacking; the Project site lacked poorly drained, fine, alkaline soils in grassland or saltbush scrub.
Sanford's arrowhead ( <i>Sagittaria sanfordii</i> )	1B.2	Ponds, sloughs, and ditches at sea level to 650 feet elevation.	<b>None.</b> No records of this species occur within 5 miles of the Project site. The species was not present during the 11 April 2025 reconnaissance survey.
Spiny-sepaled button-celery <sup>3</sup> ( <i>Eryngium spinosepalum</i> )	1B.2	Vernal pools, swales, and roadside ditches in valley and foothill grassland.	<b>None.</b> Habitat lacking; no suitable aquatic features for this species were present on the Project site.
Subtle orache <sup>3</sup> ( <i>Atriplex subtilis</i> )	1B.2	Saline depressions below 230 feet elevation.	<b>None.</b> Habitat lacking; the Project site lacked saline depressions and is above the known elevational range of this species.

<b>Species Name</b>	<b>*Listing Status</b>	<b>Habitat Requirements</b>	<b>Potential to Occur<sup>2</sup></b>
Vernal pool smallscale ( <i>Atriplex persistens</i> )	1B.2	Alkaline vernal pools below 380 feet elevation.	<b>None.</b> Habitat lacking; the Project site lacked alkaline vernal pools.
Winter's sunflower ( <i>Helianthus winteri</i> )	1B.2	Roadsides and openings on relatively steep south-facing slopes with granitic often rocky, soil from 410–1510 feet elevation.	<b>None.</b> Habitat lacking; the Project site is below the known elevational range of this species.

**\*Listing Status Notes:**

Federal<sup>1</sup>: FE – Federally listed Endangered  
 FT – Federally listed Threatened  
 FC – Federal Candidate Species  
 FPT – Federal Proposed Threatened  
 FP – State Fully Protected

State: SE – State listed Endangered  
 ST – State listed Threatened  
 SC – State Candidate Species  
 SSSC – CDFW Species of Special Concern

<sup>3</sup>Record from within 5 miles of the Project site

CRPR<sup>1</sup>: California Native Plant Society Rare Plant Rank

1B – Rare, threatened, or endangered in CA and elsewhere

2B – Rare, threatened, or endangered in CA but common elsewhere

3 – Plants about which more information is needed

4 – Limited distribution (Watch-list)

CRPR Extensions<sup>1</sup> 0.1 – Seriously endangered in California

0.2 – Fairly endangered in California

0.3 – Not very endangered in California

**Reconnaissance Survey**

Additionally, as indicated in the BRE, “Colibri Senior Scientist Amy Hernandez conducted a field reconnaissance survey at the Project site on 6 October 2025. The Project site and a 50-foot buffer (Figure 3 [in the BRE]) surrounding the Project site were walked and thoroughly inspected to evaluate and document the potential for the area to support state or federally protected resources. All plants except those under cultivation or planted in residential areas and all vertebrate wildlife species observed within the survey area were identified and documented. The survey area was evaluated for the presence of regulated habitats, including lakes, streams, and other waters as defined by the US Army Corps of Engineers, CDFW, and under the Porter-Cologne Water Quality Control Act. An additional buffer of 0.5 miles around the Project site was inspected for potential nesting habitat for special-status raptors. The 0.5-mile buffer was surveyed by driving public roads and identifying the presence of large trees or other potentially suitable substrates for nesting raptors as well as open areas that could provide foraging habitat.” (BRE, page 14).

Further, “The Project site consisted of an irrigated, maintained almond orchard (Figures 5 and 6 [in the BRE]). Ruderal herbaceous vegetation dominated by nonnative grasses and forbs was distributed throughout the Project site. Vegetation within the orchard rows showed signs of herbicide treatment (e.g., short, yellow vegetation with twisted leaves and cupped foliage). Two valley oak (*Quercus lobata*) trees were along the southern boundary of the Project site (Figure 7 [in the BRE]). California ground squirrel (*Otospermophilus beecheyi*) burrows were sparsely distributed along the fence line of the neighboring orchard at the eastern boundary of the survey area (Figure 8 [of the BRE]). Valley pocket gopher (*Thomomys bottae*) burrows with openings less than 2 inches in diameter were scattered throughout the Project site.

The proposed Project site is bound by the existing TCOE Administration and Conference facilities to the west, walnut orchard to the east, single-family residential (mobile home park) and scattered rural residences to the north, an institutional use (church with accessory uses), and mixed commercial uses to the southwest. Aerial imagery indicates the Project site has been used for agricultural production since at least 2003 (Google 2025).”

## **Regulatory Setting**

### **Federal**

#### *Federal Endangered Species Act (FESA)*

The FES defines an *endangered species* as “any species or subspecies that is in danger of extinction throughout all or a significant portion of its range.” A threatened species is defined as “any species or subspecies that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.”

#### *The Federal Migratory Bird Treaty Act (FMBTA: 16 USC 703-712)*

FMBTA prohibits killing, possessing, or trading in any bird species covered in one of four international conventions to which the United States is a party, except in accordance with regulations prescribed by the Secretary of the Interior. The name of the act is misleading, as it actually covers almost all birds native to the United States, even those that are non-migratory. The FMBTA encompasses whole birds, parts of birds, and bird nests and eggs. Although the USFWS and its parent administration, the U.S. Department of the Interior, have traditionally interpreted the FMBTA as prohibiting incidental as well as intentional “take” of birds, a January 2018 legal opinion issued by the Department of the Interior now states that incidental take of migratory birds while engaging in otherwise lawful activities is permissible under the FMBTA. However, the California Fish and Game Code makes it unlawful to take or possess any non-game bird covered by the FMBTA (Section 3513), as well as any other native non-game bird (Section 3800), even if incidental to lawful activities.

#### *Clean Water Act*

Section 404 of the Clean Water Act of (1972) is to maintain, restore, and enhance the physical, chemical, and biological integrity of the nation's waters. Under Section 404 of the Clean Water Act, the US Army Corps of Engineers (USACE) regulates discharges of dredged and fill materials into "waters of the United States" (jurisdictional waters). Waters of the US including navigable waters of the United States, interstate waters, tidally influenced waters, and all other waters where the use, degradation, or destruction of the waters could affect interstate or foreign commerce, tributaries to any of these waters, and wetlands that meet any of these criteria or that are adjacent to any of these waters or their tributaries.

## **State**

### *Birds of Prey (CA Fish and Game Code Section 3503.5)*

Birds of prey are protected in California under provisions of the Fish and Game Code (Section 3503.5), which states that it is unlawful to take, possess, or destroy any birds in the order Falconiformes (hawks and eagles) or Strigiformes (owls), as well as their nests and eggs. The bald eagle and golden eagle are afforded additional protection under the federal Bald and Golden Eagle Protection Act (16 USC 668), which makes it unlawful to kill birds or their eggs.

### *California Native Plant Protection Act*

The California Native Plant Protection Act of 1977 (CFGF Sections 1900–1913) requires all state agencies to use their authority to carry out programs to conserve endangered and otherwise rare species of native plants. Provisions of the act prohibit the taking of listed plants from the wild and require the project proponent to notify CDFW at least 10 days in advance of any change in land use, which allows CDFW to salvage listed plants that would otherwise be destroyed.

### *Nesting Birds*

CFGF Sections 3503, 3503.5, and 3800 prohibit the possession, incidental take, or needless destruction of birds, their nests, and eggs. CFGF Section 3511 lists birds that are "Fully Protected" as those that may not be taken or possessed except under specific permit.

### *Porter-Cologne Water Quality Control Act*

The Porter-Cologne Water Quality Control Act (California Water Code Section 13000 et. sec.) was established in 1969 and entrusts the SWRCB and nine Regional Water Quality Control Boards (collectively Water Boards) with the responsibility to preserve and enhance all beneficial uses of California's diverse waters. The Act grants the Water Boards authority to establish water quality objectives and regulate point- and nonpoint source pollution discharge

to the state's surface and ground waters. Under the auspices of the United States Environmental Protection Agency, the Water Boards are responsible for certifying, under Section 401 of the federal Clean Water Act, that activities affecting waters of the United States comply with California water quality standards. The Porter-Cologne Water Quality Control Act addresses all "waters of the State," which are more broadly defined than waters of the United States. Waters of the State include any surface water or groundwater, including saline waters, within the boundaries of the state. They include artificial as well as natural water bodies and federally jurisdictional and federally non-jurisdictional waters. The Water Boards may issue a Waste Discharge Requirement permit for projects that will affect only federally non-jurisdictional waters of the State.

#### *California Endangered Species Act (CESA)*

CESA prohibits the take of any state-listed threatened and endangered species. CESA defines *take* as "any action or attempt to hunt, pursue, catch, capture, or kill any listed species." If the proposed Project results in a take of a listed species, a permit pursuant to Section 2080 of CESA is required from the CDFG.

### **Regional/Local**

#### *City of Visalia Oak Tree Ordinance*

Title 12 Chapter 24 of the City of Visalia Municipal Code (VMC) (City of Visalia 2025) prohibits the destruction or removal of Valley Oak Tree (*Quercus lobata*) in the city by outlining procedures and penalties for removal. Section 12.24.030 requires a permit for removal of oak trees in the city based on meeting one or more of the removal standards criteria in Section 12.24.035. Per Title 12 Chapter 24 of the VMC Subsection B of Section 12.24.035 lists the potentially applicable removal standard for the Project, subject to approval by the city manager:

"B. Removal of the oak tree is necessary to allow construction of new improvements or the repair or protection of pre-existing improvements that have been interfered with by the oak tree or otherwise allow the reasonable enjoyment of private property. The city manager shall apply the following factors in determining the necessity of removal of an oak tree for purposes of this subsection:

1. The size and age of the oak tree to be removed, and its historic, aesthetic or cultural value; a larger, older and more historically, aesthetically, or culturally valuable tree may be removed only if each of the other factors weigh heavily in favor of removal.
2. The necessity of the removal of the oak to the enjoyment of the property by the property owner or protection of preexisting improvements.
3. The lack of any reasonable alternative to the proposed improvement that does not require removal of the oak tree. The availability of funds from the Oak Tree Maintenance

Fund to assist the property owner in repairing or reconfiguring improvements in a manner to save an oak tree should be taken into account in determining whether reasonable alternatives to removal exist such that a permit on this grounds should not be granted.

Section 12.24.037 requires compensatory mitigation as outlined in the City of Visalia Oak Tree Mitigation Policy (City of Visalia 2025) for permitted oak tree removal. As shown in Section 12.24.037, "...pursuant to Subparagraph B. of section [12.24.035](#) offset the loss of the oak tree by either replacing the oak tree removed with new oak trees on the same property (in-kind mitigation) or by paying mitigation fees intended to be used for the establishment of new oak trees on other property or on public property for the benefit of the general public (in-lieu mitigation). In furtherance of this policy, the city manager shall develop an Oak Tree Mitigation Policy establishing in-kind and in-lieu mitigation measures to be required for oak tree removals. The Oak Tree Mitigation Policy, and any subsequent amendment thereto, shall be submitted to the city council for approval by resolution." (see: VMC at: [12.24.037 Mitigation requirements](#)). However, the Oak Tree Ordinance has been revised/updated to exclude private property such as the property where the TCOE Project would occur.

#### *Visalia Planning Area General Plan*

The Visalia Planning Area General Plan contains the following policies related to the preservation of biological resources that may be considered relevant to the proposed Project's environmental review:

- OSC-P-30 Require assessments of biological resources prior to approval of any discretionary development Projects involving riparian habitat, wetlands, or special status species habitat. Early in the development review process, consult with California Department of Fish and Game, U.S. Fish and Wildlife Service, and other agencies.
- OSC-P-31 Protect and enhance habitat for special status species, designated under state and federal law. Require protection of sensitive habitat areas and special status species in new development in the following order: 1) avoidance; 2) onsite mitigation, and 3) offsite mitigation.

#### **Discussion**

**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 & Game or U.S. fish and Wildlife Service?**

**Less Than Significant Impact with Mitigation:** Project activities have the potential to affect candidate, sensitive, or special status species. Reviews of the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (California Department of Fish

and Wildlife, 2021) was conducted by qualified consultants Colibri Ecological Consulting, LLC (Colibri or consultants) to identify special-status plant and wildlife species with the potential to occur within the Project and in the vicinity of the Project in the Visalia 7.5" USGS quadrangle, within which the Project is situated, and the eight surrounding quadrangles. Consultants also conducted a search on the CNPS Inventory of Rare and Endangered Plants for records of special-status plant and animal species from the vicinity of the Project site. Aerial imagery from Google Earth (Google 2025) and other sources, USGS topographic maps, the Web Soil Survey (NRCS 2025), the National Wetlands Inventory (USFWS 2025b), results from a reconnaissance survey, and relevant literature were reviewed. These data sources were analyzed to assess the potential for the occurrence of special-status species and other sensitive biological resources known to exist on or near the project site (Table 3-7).

As noted in the BRE, "The Project could adversely affect, either directly or through habitat modifications, three special-status animal species that occur or may occur on or near the Project site. Construction activities such as excavating, trenching, or using other heavy equipment that disturbs or harms a special-status species or substantially modifies its habitat could constitute a significant impact. We recommend that Mitigation Measures BIO1 and BIO2 (below) be included in the conditions of approval to reduce the potential impacts to less-than-significant levels." (BRE, page 41).

Therefore, based on the BRE prepared by qualified consultant Colibri, and the information and analysis provided herein, there would be a *less than significant impact* with implementation of Mitigation Measures BIO-1 and BIO-2; as applicable.

**Mitigation Measures: See Mitigation Measures BIO-1 and BIO-2.**

Based on the BRE prepared by qualified consultant Colibri, and the information and analysis provided herein, implementation of Mitigation Measures BIO-1 and BIO-2, as applicable, would reduce impacts to less than significant.

**b) Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?**

**No Impact:** As indicated in the BRE, "This Project, which will result in temporary and permanent impacts to developed and disturbed lands, will not: "...(5) have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS (criterion f) as no impacts to riparian habitat or sensitive natural communities are expected..." (BRE, page 40). Therefore, based on the BRE prepared by qualified consultants Core, and the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the BRE prepared by qualified consultants Core, and the information and analysis provided herein, there would be *no impact*.

**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 director removal, filling, hydrological interruption, or other means?**

**Less than Significant Impact with Mitigation:** As indicated in the BRE: “The Project may permanently impact two detention basins in the western portion of the Project site. If these features contain surface water, they are likely considered state-protected wetlands regulated by the SWRCB. If project construction will permanently impact the approximately 0.4-acre and 0.6-acre detention basins, such loss could constitute a significant impact. We recommend that the mitigation measure BIO-3 (below) be included in the conditions of approval to reduce the potential impact to a less-than-significant level.” (BRE, page 42).

Moreover, City-wide biological resources were evaluated in the Visalia General Plan Update Environmental Impact Report (EIR). The EIR concluded that certain protected wetlands and other waters may be directly or indirectly affected by future development within the General Plan Planning Area. Such effects would be considered significant. However, the General Plan contains multiple policies, identified under Impact 3.8-3 of the EIR, that together work to reduce the potential for impacts on wetlands and other waters located within the Planning Area.

Implementation of the City’s policies and Municipal Code regulations regarding impacts on wetlands would also become effective, as applicable. Therefore, based on BRE prepared by qualified consultants Core, and the information and analysis provided herein, there would be a *less than significant impact* with implementation of Mitigation Measure BIO-3, as applicable.

**Mitigation Measures: See Mitigation Measure BIO-3.**

Based on the BRE prepared by qualified consultants Core, and the information and analysis provided herein, there would be a *less than significant impact* with implementation of Mitigation Measure BIO-3, as applicable.

**d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

**Less than Significant Impact with Mitigation:** As noted in the BRE, “The Project has the potential to impede the use of nursery sites for native birds protected under the MBTA and

CFG. Migratory birds are expected to nest on and near the Project site. Construction disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings or otherwise lead to nest abandonment. Disturbance that causes nest abandonment or loss of reproductive effort can be considered take under the MBTA and CFGC. Loss of fertile eggs or nesting birds, or any activities resulting in nest abandonment, could constitute a significant effect if the species is particularly rare in the region. Construction activities such as excavating, trenching, and grading that disturb a nesting bird on the Project site or immediately adjacent to the construction zone could constitute a significant effect. We recommend the mitigation measure BIO-4 (below) be included in the conditions of approval to reduce the potential effects to a less-than-significant level.” (BRE, page 43).

**Mitigation Measures: See Mitigation Measure BIO-4.**

Based on the BRE conducted by qualified consultants Calibri, and information and analysis provided herein, there would be a *less than significant impact* with implementation of Mitigation Measure BIO-4, as applicable.

**e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

**Less Than Significant Impact:** As noted in the BRE, “Valley oak (*Quercus lobata*) trees sparsely lined the eastern portion of the northern boundary (Figure 10 [in the BRE]), and valley oak seedlings were sparsely distributed throughout the Project site.” (BRE, page 29).

The City has a municipal ordinance, as applicable, in place to protect Valley Oak Trees. The City of Visalia’s Oak Tree Preservation Ordinance specifies that a Valley Oak Tree Management Plan Form be submitted for consideration, or an Oak Tree Removal Application be submitted to obtain a permit and to determine compensatory mitigation prior to removal. However, as noted earlier, the Oak Tree Ordinance has been revised/updated to exclude private property such as the property where the TCOE Project would occur. Therefore, based on the BRE prepared by qualified consultants Colibri, and the information and analysis contained herein, there would be a *less than significant impact*.

**Mitigation Measures: None required.**

Based on the BRE prepared by qualified consultants Colibri, and the information and analysis provided herein, impacts to Valley Oak Trees would be *less than significant*.

**f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

**No Impact:** As noted in the BRE, there are no habitat conservation plans or Natural Community Conservation Plans (NCCP) in the proposed Project area. Therefore, based on BRE prepared by qualified consultants Colibri, and the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None Required.**

Based on the BRE prepared by qualified consultants Colibri, and the information and analysis provided herein, no mitigation measures would be required.

**Mitigation Measures: See BIO-1 through BIO-5**

The following mitigation measures were recommended by qualified consultants Colibri Ecological Consulting, LLC in the BRE (Appendix B). It is noted that BIO-5 has been modified (while retaining its content), from the BRE to reflect specific availability of the City's Valley Oak Tree Management Plan Form and the City's Oak Tree Removal Application.

**Mitigation Measure BIO-1: Protect nesting Swainson's hawks.**

1. To the extent practicable, construction shall be scheduled to avoid the Swainson's hawk nesting season, which extends from March through August.
2. If it is not possible to schedule construction between September and February, a qualified biologist shall conduct a pre-construction clearance survey for Swainson's hawk in accordance with the Swainson's Hawk Technical Advisory Committee's Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (SWTAC 2000). A pre-construction survey shall be conducted no more than 14 days prior to the initiation of construction activities. During the pre-construction clearance survey, the qualified biologist shall inspect all potential nest substrates within a minimum 0.5-mile radius around the Project site.
3. If an active Swainson's hawk nest is found within 0.5 miles of the Project site, and the qualified biologist determines that Project activities would disrupt the nesting birds, a construction-free buffer or limited operating period shall be implemented in consultation with the CDFW.

**Mitigation Measure BIO-2: Protect roosting pallid bat and western mastiff bat.**

1. A pre-construction clearance survey shall be conducted by a qualified biologist to ensure that no roosting pallid bats or western mastiff bats will be disturbed during the implementation of the Project. A pre-construction clearance survey shall be conducted no more than 14 days prior to the initiation of construction activities. During this survey, the

qualified biologist shall inspect all potential roosting habitat in and immediately adjacent to the impact areas.

2. If an active roost is found close enough to the construction area to be disturbed by these activities, the qualified biologist shall determine the extent of a construction-free buffer to be established around the roost. If work cannot proceed without disturbing the roosting bats, work may need to be halted or redirected to other areas until the roost is no longer in use.

**Mitigation Measure BIO-3: Obtain a permit from the SWRCB for impacts to jurisdictional waters.**

1. Obtain a Waste Discharge Requirements permit from the SWRCB via the Central Valley Regional Water Quality Control Board if the Project is expected to permanently impact the detention basins and provide the required compensatory mitigation.

**Mitigation Measure BIO-4: Protect nesting birds.**

1. To the extent practicable, construction shall be scheduled to avoid the nesting season, which extends from February through August.
2. If it is not possible to schedule construction between September and January, pre-construction surveys for nesting birds shall be conducted by a qualified biologist to ensure that no active nests will be disturbed during the implementation of the Project. A pre-construction survey shall be conducted no more than 14 days prior to the initiation of construction activities. During this survey, the qualified biologist shall inspect all potential nest substrates in and immediately adjacent to the impact areas. If an active nest is found close enough to the construction area to be disturbed by these activities, the qualified biologist shall determine the extent of a construction-free buffer to be established around the nest. If work cannot proceed without disturbing the nesting birds, work may need to be halted or redirected to other areas until nesting and fledging are completed or the nest has otherwise failed for non-construction related reasons.

Based on the BRE prepared by qualified consultant Colibri, and the information and analysis provided herein, and the implementation of Mitigation Measures BIO-1 through BIO-4, the Project would result in a *less than significant impact*.

**Cumulative Impact: Less than Significant with Mitigation**

The Visalia General Plan planning area and its accompanying EIR study area is the cumulative impact area. As noted earlier, the Project site does not include any known biological resources that would be impacted by the Project. Also as noted earlier, this

analysis relies on the information, determinations, technical studies, etc., contained in the adopted/certified General Plan EIR and CNDDDB search. The BRE prepared by qualified consultants Colibri Ecological Consulting, LLC search results indicate that there are no known resources on the Project site. However, as an abundance of caution, the Project will be required to comply with applicable City requirements and Mitigation Measures BIO-1 through BIO-4, as applicable, to avoid or minimize impacts in the event that any resources applicable to this Checklist Item are impacted. Therefore, based on the BRE prepared by qualified consultant Colibri, and the information and analysis provided herein, the Project would result in a *less than significant impact* with mitigation.

## V. CULTURAL RESOURCES

<b>Would the Project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In addition to references of the Visalia General Plan and its accompanying EIR, the analysis in this section is supplemented by the “Phase 1 Cultural Resources Assessment for the Tulare County Office of Education Administration and Conference Center Expansion Project, City of Visalia, Tulare County, California Project” (CRA) prepared by qualified consultants Taylored Archaeology in October 2025. The full report can be found in Appendix C.

As noted in the CRA, “This report documents the results of a cultural resource assessment of the proposed Project area. In order to comply with California regulations for CEQA, the following specific tasks were completed: (1) requesting a records search from the Southern San Joaquin Information Center (SSJVIC) of the California Historical Resources Information System (CHRIS), at California State University, Bakersfield; (2) a review of site archives (3) requesting a Sacred Lands File Search and a list of interested parties from the Native American Heritage Commission (NAHC) (4) conducting an archaeological pedestrian survey, and (5) preparing this technical report.

Taylored Archaeology prepared this report following the California Office of Historic Preservation standards in the 1990 Archaeological Resources Management Report Recommended Contents and Format. Chapter 1 describes the introduction of the Project and its location and identifies the key personnel involved in this report. Chapter 2 summarizes the Project setting, including the natural, prehistoric ethnography, and historic background for the Project site and surrounding area. Chapters 3 details the methods used for cultural records

searches, local Native American outreach, and archaeological pedestrian survey. Chapter 4 summarizes the results of the cultural resource investigation. Chapter 5 discusses the Project findings and offers management recommendations. Chapter 6 is a bibliography of references cited within this report. The report also contains the following appendices: qualifications of key personnel (Appendix A [of the CRA]), the CHRIS records search results (Appendix B [of the CRA]), and Sacred Lands File search results (Appendix C [of the CRA]).” (See CRA, 1.4 Report Structure, page 7).

## **Environmental Setting**

As noted in the CRA, “The Project area lies in the Central Valley of California, which is approximately 450 miles from north to south, and ranges in width east to west from 40 to 60 miles (Prothero 2017). The Central Valley is divided into two subunits, the Sacramento Valley in the north and the San Joaquin Valley in the south, which are each named after the primary rivers within each valley (Madden 2020). The Project is located approximately 305 feet above sea level on the open flat plains of the Southern San Joaquin Valley. Climate within the San Joaquin valley is classified as a ‘hot Mediterranean climate’, with hot and dry summers, and cool damp winters characterized by periods of dense fog known as ‘tule fog’ (Prothero 2017).” (CRA, page 8).

“The Project is in central western Tulare County on the valley floor of the San Joaquin Valley within the greater Kaweah River Delta alluvial fan. Specifically, the Project is located on a former bank of Mill Creek, which is a distributary of the Kaweah River (Hammond 1885). Distributaries form when debris-laden river waters meet abrupt changes in channel and slope confinement, resulting in unstable channel networks that change with time (Wagner et al. 2013). Before the appearance of agriculture in the nineteenth century, the general Project location would have been comprised of prairie grasslands with scattered oak tree savannas near the foothills, and riparian forest along the various streams and drainages (Preston 1981).” (CRA page 8).

## **Historic Setting**

### *California History*

“European contact in modern-day California first occurred in 1542 with the arrival of a Spanish expedition lead by Juan Rodríguez Cabrillo into San Diego Bay (Engstrand 1997). Expeditions along the California coast continued throughout the sixteenth century and primarily focused on finding favorable harbors for further expansion and trade across the Pacific. However, rocky shorelines, unfavorable currents, and wind conditions made traveling north from New Spain to the upper California coast a difficult and time-consuming journey (Eifler 2017). The topography of California, with high mountains, large deserts, and few natural harbors lead to European expansion into California only starting in the 1760s. As British and Russian expansion through fur trading encroached on California from the north, Spain established a system of presidios,

pueblos, and missions along the California coast to defend its claim, starting with Mission San Diego de Alcalá in 1769 (Engstrand 1997).” (CRA, page 12)

### *Central California History*

“The San Joaquin Valley did not experience contact with Europeans until the late 1700s (Starr 2007). Life at the California missions was hard and brutal for Native Americans, with many dying of disease, poor conditions, and many fleeing to areas not under direct Spanish control (Jackson and Castillo 1995). The earliest exploration of the San Joaquin Valley by Europeans was likely by the Spaniards when in the fall of 1772 a group known as the Catalanian Volunteers entered the valley through Tejon Pass in search of deserters from the Southern California Missions (Zack 2017). However, the group only made it as far north as Buena Vista Lake in modern day Kern County before turning around due to the extensive swamps. Additional excursions to the valley were for exploration such as those led by Lieutenant Bariel Moraga in 1806, but also to find sites for suitable mission sites and to track down Native Americans fleeing the coastal missions (Cook 1958).

Subsequent expeditions were also sent to pursue outlaws from the coast who would often flee to the valley for safety. One of the subsequent explorations was an expedition in 1814 to 1815 with Sargent Juan Ortega and Father Juan Cabot, who left the Mission San Miguel with a company of approximately 30 Spanish soldiers and explored the San Joaquin Valley (Smith 2004). This expedition passed through the Kaweah Delta and modern-day Visalia and made a recommendation to establish a mission near modern-day Visalia. However, with European contact also came European disease. Malaria and other new diseases were brought by Europeans, and in 1833 an epidemic of unknown origin traveled throughout the Central Valley. Some estimates place the Native American mortality of the epidemic as high as 75 percent (Cook 1955b). Combined with the rapid expansion of Americans into California in 1848 during the Gold Rush, Native American populations within the valley never fully recovered (Eifler 2017).

Initial settlement within the valley by Europeans in the 1830s was largely either by trappers like Jedediah Smith or horse thieves like Pegleg Smith (Clough and Secrest 1984). In fact, horse and other livestock theft was so rampant that ranching operations on the Rancho Laguna de Tache by the Kings River and Rancho del San Joaquin Rancho along the San Joaquin River could not be properly established (Cook 1962). With the end of the Mexican American War and the beginning of the gold rush in 1848, the San Joaquin Valley became more populated with ranchers and prospectors. Most prospectors traveled by sea to San Francisco and used rivers ranging from the Sacramento River to the San Joaquin River to access the California interior (Eifler 2017). Most areas south of the San Joaquin River were less settled simply because those rivers did not connect to the San Francisco Bay area except in wet flood years. By 1850, California became a state and Tulare County was established in 1853.” (CRA, pages 11-12).

### *Local History*

"The City of Visalia is one of the oldest cities within the Southern San Joaquin Valley and was founded in 1852. By the late 1850s the town of Visalia was a major station along the Butterfield Overland Mail stage route as it traveled north from Los Angeles to Stockton (Helmich 2008). During the first few decades, Visalia was a supply center for nearby gold rushes, served as the regional population center of Tulare County, and had an agricultural economy based on livestock and some agriculture (Dyett and Bhatia 2014). During the 1850s and 1860s roughly made earthen ditches and dams diverted stream water for irrigation, with the earliest ditches in the San Joaquin Valley being constructed in Visalia between 1852 to 1853 (Caltrans 2000). The Southern Pacific Railroad was extended from Fresno into Tulare County in the early 1870s but bypassed the City of Visalia as the city was located six miles to the east of the rail line (Small 1926). (CRA, page 13).

## **Methodology**

### *Records Search*

"Taylored Archaeology requested a cultural resource records search from the SSJVIC of the CHRIS at California State University in Bakersfield, California on September 15, 2025. The purpose of this request was to identify and review prior cultural resource studies and previously recorded cultural resources on or near the Project boundary. The records search included prior cultural resources investigation reports conducted, previously recorded resources within the Project boundary and the 0.5-mile radius around the Project boundary (Appendix C [of the CRA]). Also included in research were cultural resource records (DPR forms) as well as the Historic Properties Directory of the Office of Historic Preservation list, General Land Office Maps, Archaeological Determinations of Eligibility list, and the California Inventory of Historic Resources list." (CRA, page 15).

"The SSJVIC provided the records search results in a letter dated September 30, 2025 (Appendix B [of the CRA]). According to the search results, three prior cultural resource studies were conducted within the Project area (Table 4-1 [of the CRA]). Further review of these studies showed that only one overlaps the Project site. TU-01747 is an archaeological field survey for a proposed cellular tower. TU-00041 TU-01190 is a historical account of the Mariposa War of 1850-1851 and is not pertinent to this Project area. In addition, four previous cultural resources studies were within a 0.5-mile radius of the Project boundary as depicted in Table 4-2 [of the CRA]. None of these studies intersected the Project boundary.

The SSJVIC reported there were no cultural resources previously documented within the Project area. Two cultural resources, both historic era, were recorded within a 0.5-mile radius of the Project boundary (Table 4-3 [of the CRA]). None of these previously recorded resources intercept the Project boundary." (CRA, page 17).

### *Archival Research*

Archival research was conducted to investigate the historical background for any potential historic structures, buildings and historical deposits that may exist and land use within the Project boundary. Historical maps, historical aerial photographs, historical US Geological Survey (USGS) topographic maps, Google Earth aerial photographs, Google Street View photos, Map Aerial Locator Tool (MALT) at the Henry Madden Library, California State University, Fresno, books, articles and other records were used to better understand the prehistory and history of the Project area. The results of this research are presented in Chapter 4 [of the CRA].” (CRA, page 15).

“Historic map coverage of the Project site begins with a 1927 USGS topographic map, which depicts the site as open field bound by an unnamed road to the west in the same alignment as present-day Highway [SR] 63, and a “Liberty Road” to the south in the same alignment as Avenue 264 (USGS 1927). No buildings or structures are depicted on the Project site in 1927. By 1949 the southern half of the Project site is shown as an orchard with three buildings on the Project site, one in the southeast corner along Avenue 264, one in the center northern portion of the site, and one along the western boundary of the site along Highway [SR] 63. A small road is also depicted along the southwestern boundary of the Project site from Highway [SR] 63 to the central building (USGS 1947). By 1969, the northwestern portion of the project site is labeled as “Drive-in Theater” in the area presently occupied by the TCOE administration building and parking lot (USGS 1969). Otherwise the site is similar to the 1949 USGS topographic site. USGS Topographic maps after 1969 for the Project site do not depict any details other than Highway [SR] 63 to the west and Avenue 264 to the south.

Available historic aerial photograph coverage of the Project site began in 1946 with historic aerial photographs by the United State Agricultural Adjustment Administration (USAAA), which depicts the Project site in similar configuration to the 1947 USGS topographic map (USAAA 1946). The next available historic aerial photograph dates to 1956, which shows the northwest corner of the Project site occupied by a drive-in movie theater in a similar configuration to the one depicted in the 1969 topographic map (NETROnline 2025). The remainder of the Project site is comprised of an agricultural field in the northern half and an orchard with a rural residence in the southern half. The rural residence appears to have been removed sometime between 1984 and 1994, and the movie theater appears to have been demolished sometime between 2005 to 2009 (Google Earth 2025). The TCOE Administration building appears to have been constructed in 2015 and the orchard in the eastern portion of the Project site in early 2025 (Google Earth 2025).” (CRA, pages 18-19).

#### *NAHC Sacred Lands File*

“Taylored Archaeology sent a request to the NAHC as part of this cultural resources investigation for a Sacred Lands File (SLF) search on September 15, 2025. The objective of the SLF search was to identify tribal cultural resources present in or near the Project boundary.

Native American outreach and consultation with Tribes are not included in this scope of work. It is assumed that government-to-government consultation under Assembly Bill (AB) 52 will

be conducted by the CEQA lead agency. The SLF results are in Chapter 4 [of the CRA].” (CRA, page 15).

#### *Archaeological Pedestrian Survey*

“On October 4, 2025, Archaeologist Consuelo Sauls conducted an archaeological pedestrian survey of the 57.4-acre Project site. The survey began in the southeast corner of the Project boundary, using transects spaced 5 meters apart oriented east to west. The archaeologist carefully inspected all exposed ground surface and rodent burrow back-dirt piles and other areas of bare earth for soil discoloration that could indicate the presence of artifacts (e.g., lithics and ceramic sherds), soil depressions, and features indicating the former presence of buildings or structures (e.g., postholes and foundations). The Project boundary was checked for both prehistoric deposits and historic-age features, structures, and artifacts more than 50 years old that may be present on the ground surface. A plan map of the Project site was used to see land usage, structures and map out transects. Field survey observations were documented in the field and survey coordinates were recorded on a Gaia Global Positioning System application. Photographs were taken of the Project site using an iPhone 11 Pro digital camera.” (CRA, pages 15-16).

#### *Native American Outreach*

As noted in the CRA, “The NAHC responded on June 17, 2025 (Appendix C [of the CRA, Appendix C herein]). The search results of the SLF were negative for the presence of tribal cultural resources within the Project area. The NAHC provided a contact list of Native American tribes who may have knowledge of cultural resources in the Project area (Appendix C [of the CRA, Appendix C herein]).” (CRA, page 19).

The following Native American organizations/individuals were contacted from the list provided by NAHC below:

1. Chairperson Delia Dominguez of the Kitanemuk & Yowlumne Tejon Indians;
2. Cultural Specialist I Nichole Escalon of the Santa Rosa Rancheria Tachi Yokut Tribe;
3. Cultural Specialist II Samantha McCarty of the Santa Rosa Rancheria Tachi Yokut Tribe;
4. Tribal Historic Preservation Officer Shana Powers of the Santa Rosa Rancheria Tachi Tribe;
5. Chairperson Michelle Heredia-Cordova of Table Mountain Rancheria;
6. Cultural Resource Director Bob Pennell of Table Mountain Rancheria;
7. Tribal Historic Preservation Officer Felix Christman of the Tule River Tribe;
8. Environmental Department Kerri Vera of the Tule River Tribe; and
9. Chairperson Kenneth Woodrow of the Wuksache Indian Tribe/Eshom Valley Band.

The outreach letters were sent to all the Native American representatives on the contact list on October 14, 2025 (Appendix C [of the CRA, Appendix C herein]). The letters included a description of the proposed Project and a topographic map of the location. No responses were received regarding the Project area.” (See CRA pages 16-17).

### *Archaeological Survey Results*

As indicated in the CRA (see Appendix C), “The Project site consisted of a fully developed commercial area with a parking lot, two small basins, open field, and a recently removed orchard at Assessor’s Parcel Numbers 122-470-003, 122-480-004 and 122-480-008 (Figure 4-1 [of the CRA]). The fenced basin areas in 122-480-008 and the northeast portion of 122-480-004 were not accessible (Figures 4-2 and 4-3 [of the CRA]). Most of the development area in APN 122-480-004 is landscaped with ornamental bushes and paved parking lots. In the east portion of the parcel was mostly dirt and appeared to be used as a parking lot.

The natural topography of the Project site has been altered by historical and modern agricultural practices and commercial development and much of the land on the Project site has been graded, plowed, planted and/or harvested, which has caused additional disturbance to the soil.

The ground surface visibility within the Project boundary was mostly excellent (100 percent) in the open field and the dirt lot behind the parking lot (Figure 4-4 [of the CRA]). Ground visibility in the developed commercial area was generally the poorest (0-30 percent) where most of the ground was covered in asphalt (Figure 4-5 [of the CRA]). The soil in the Project boundary consisted of alluvial sandy loam and was grayish brown and appeared highly disturbed by historical and modern land-use practices, including infrastructural development. Ground disturbances, such as burrows and soil piles, were visually inspected.

No cultural resources were encountered within the Project boundary. While past agricultural and development activities may have potentially destroyed or obscured ground surface evidence of archaeological resources within the Project site, intact archaeological resources may potentially exist below the ground surface.” (See CRA, pages 19-20).

### **Regulatory Setting**

“In this report “cultural resources” are defined as prehistoric or historical archaeological sites as well as historical objects, buildings, or structures. In accordance with 30 Code of Federal Regulations (CFR) §60.4, “historical” in this report applies to cultural resources which are at least 50 years old. The significance or importance of a cultural resource is dependent upon whether the resource qualifies for inclusion at the local or state level in the California Register of Historical Resources (CRHR), or at the federal level in the National Register of Historic Places (NRHP). Cultural resources that are determined to be eligible for inclusion in the CRHR are called “historical resources” (California Code of Regulations [CCR] 15064.5[a]). Under this statute the determination of eligibility is partially based on the consideration of the criteria of significance as defined in 14 CCR 15064.5(a)(3). Cultural resources eligible for inclusion in the NRHP are deemed “historic properties.” (CRA, pages 1-2).

## **Federal**

### *National Historic Preservation Act*

The National Historic Preservation Act was adopted in 1966 to preserve historic and archeological sites in the United States and is administered by the National Park Service. The Act created the National Register of Historic Places, the list of National Historic Landmarks, the Advisory Council on Historic Preservation (ACHP), and the State Historic Preservation offices. Section 106 of the NHPA requires federal agencies to consider the impacts of their actions on historic properties and provide an opportunity for the ACHP to comment on Projects prior to their implementation. This section also requires agencies to be publicly accountable for any potential consequences to their actions on historic properties. To be eligible for listing, a property must retain integrity of location, design, setting, materials, workmanship, feeling, and associations, and possess one of the following characteristics:

- Association with events that have made a significant contribution to the broad patterns of history (events).
- Association with the lives of persons significant in the past (persons).
- Distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction (architecture).
- Has yielded, or may be likely to yield, information important to prehistory or history (information potential).

## **State**

### *California Senate Bill 18*

The Local and Tribal Intergovernmental Consultation process, commonly known as SB 18, was signed into law September of 2004 and took effect March 1, 2005. SB 18 refers to PRC Sections 5097.9 and 5097.993, which define cultural places as:

- Native American sanctified cemetery place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9).
- Native American historic, cultural, or sacred site that is listed or may be eligible for listing in the California Register of Historic Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.993).

SB 18 established responsibilities for local governments to contact, provide notice to, refer plans to, and consult with California Native American tribes that have been identified by the NAHC and if that tribe requests consultation after local government outreach as stipulated in Government Code Section 65352.3. The purpose of this consultation process is to protect the

identity of the cultural place and to develop appropriate and dignified treatment of the cultural place in any subsequent project. The consultation is required whenever a general plan, specific plan, or open space designation is proposed for adoption or to be amended. Once local governments have been sent notification, tribes are responsible for requesting consultation. Pursuant to Government Code Section 65352.3(a)(2), each tribe has 90 days from the date on which they receive notification to respond and request consultation. In addition to the requirements stipulated previously, SB 18 amended Government Code Section 65560 to “allow the protection of cultural places in open space element of the general plan,” and amended Civil Code Section 815.3 to add “California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.”

### *California Assembly Bill 52*

The legislature added the requirements regarding tribal cultural resources through AB 52. By including an understanding if any tribal cultural resources could be present within an area early in the CEQA process, the legislature intended to ensure that local and tribal governments, public agencies, and project proponents would have information available to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process (AB 52 Section 1[b][7]). Please see Section 4.5.5 for information regarding the City’s AB 52 consultation process for this Project.

Section 1 of the bill states the legislature’s intent as follows (AB 52 Section 1[b]):

*“...In recognition of their (California Native American Tribes) governmental status, establish a meaningful consultation process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning tribal cultural resources, at the earliest possible point in the CEQA environmental review process. To accomplish those goals, the legislature added or amended the following sections in the PRC: 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 5097.94.”*

### *California Register of Historical Resources*

In California, the term “historical resource” includes “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (California PRC § 5020.1[j])(State of California 2021). In 1992, the California legislature established the California Register of Historical Resources (CRHR) “to be used by state and local agencies, private groups, and citizens to identify the

state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (California PRC § 5024.1(a)). The criteria for listing resources on the CRHR, enumerated in the following text, were developed to be in accordance with previously established criteria developed for listing in the NRHP. According to California PRC § 5024.1(c) (1– 4), a resource is considered historically significant if it (i) retains “substantial integrity,” and (ii) meets at least one of the following criteria:

- The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California).
- Associated with an individual or group having a profound influence on the history of California.
- A prototype of, or an outstanding example of, a period, style, architectural movement, or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer, or master builder.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the National Register of Historic Places (NRHP), and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

## **Regional/Local**

### *City of Visalia General Plan*

Under Chapter 3, the City’s Role and Tools for Preservation, in the General Plan of the City of Visalia defines a “cultural resources” as:

- **Chapter 3.3:** Sites, structures, or any other physical evidence associated with human activity considered important to be culturally important. This includes archaeological resources and contemporary Native American resources in addition to the historic resources that are the subject of this chapter. Impacts of development on cultural resources of all kinds must be avoided to the greatest extent possible, as described by policies in Chapter 6: Open Space and Conservation.
- **Chapter 6.5:** OSC-P-39 Establish requirements to avoid potential impacts to sites suspected of being archeologically, paleontologically, or historically significant or of concern, by:

- Requiring a records review for development proposed in areas that are considered archaeologically or paleontologically sensitive.
- Determining the potential effects of development and construction on archaeological or paleontological resources (as required by CEQA).
- Requiring pre-construction surveys and monitoring during any ground disturbance for all development in areas of historical and archaeological sensitivity.
- Implementing appropriate measures to avoid the identified impacts, as conditions of Project approval.

In the event that previously unidentified historical, archaeological, or paleontological resources are discovered during construction, grading activity in the immediate area shall cease and materials and their surroundings shall not be altered or collected. A qualified archaeologist or paleontologist must make an immediate evaluation and avoidance measures, or appropriate mitigation should be completed, according to CEQA Guidelines. The State Office of Historic Preservation has issued recommendations for the preparation of Archaeological Resource Management Reports that will be used as guidelines.

### **Discussion**

#### **a) Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?**

**Less Than Significant Impact with Mitigation:** As noted earlier, qualified consultants Taylored Archaeology conducted a records search on behalf of the Applicant from the SSJVIC of the CHRIS at California State University, Bakersfield, California. The searches are used to determine if historical or archaeological sites had previously been recorded within the study area, if the Project area had been systematically surveyed by archaeologists prior to the initial study, and/or whether the region of the field Project was known to contain archaeological sites and to thereby be archaeologically sensitive. In addition, an archival research and an archaeological pedestrian survey was conducted to identify cultural resources.

As noted earlier, according to the results of the SSJVIC records search, there have been three prior cultural resource studies conducted within the Project area with one overlapping the Project area; however, it is not pertinent to the Project area. Also, four cultural resource studies were within a 0.5-mile radius of the Project area; however, none of these studies intercept the Project boundary.

Also as noted earlier, archival research of historical topographic maps and aerial images indicates that the expanded Project site has largely been used for agricultural purposes. Also as noted earlier, the historical aerial from 1956 shows the northwest corner of the Project site occupied by a drive-in movie theater in a similar configuration to the one depicted in the 1969 topographic map (NETROnline 2025). The remainder of the Project site

is comprised of an agricultural field in the northern half and an orchard with a rural residence in the southern half. The rural residence appears to have been removed sometime between 1984 and 1994, and the movie theater appears to have been demolished sometime between 2005 to 2009 (Google Earth 2025). The TCOE Administration building appears to have been constructed in 2015 and the orchard in the eastern portion of the Project site in early 2025 (Google Earth 2025).

The archaeological pedestrian survey did not identify any cultural resources on the ground surface within the Project boundary. The absence of cultural material on the ground surface does not, however, preclude the possibility of Project construction unearthing buried archaeological deposits. While past agricultural and development activities may have destroyed or obscured ground surface evidence of archaeological resources within the Project site, intact archaeological resources may potentially exist subsurface (i.e., below the ground surface).

Therefore, based on the information and analysis provided herein, implementation of Mitigation Measures CUL-1 and CUL-2 will ensure that impacts to potential historical resources would be *less than significant with mitigation* incorporation.

**Mitigation Measures:** See Mitigation Measures discussion.

**b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

**Less Than Significant Impact with Mitigation:** As noted in the CRA, “On October 4, 2025, Archaeologist Consuelo Sauls conducted an archaeological pedestrian survey of the 57.4-acre Project site. The survey began in the southeast corner of the Project boundary, using transects spaced 5 meters apart oriented east to west. The archaeologist carefully inspected all exposed ground surface and rodent burrow back-dirt piles and other areas of bare earth for soil discoloration that could indicate the presence of artifacts (e.g., lithics and ceramic sherds), soil depressions, and features indicating the former presence of buildings or structures (e.g., postholes and foundations). The Project boundary was checked for both prehistoric deposits and historic-age features, structures, and artifacts more than 50 years old that may be present on the ground surface. A plan map of the Project site was used to see land usage, structures and map out transects. Field survey observations were documented in the field and survey coordinates were recorded on a Gaia Global Positioning System application. Photographs were taken of the Project site using an iPhone 11 Pro digital camera.” (see Appendix C, CRA pages 15-16).

Also as noted in the CRA, “No cultural resources were encountered within the Project boundary. While past agricultural and development activities may have potentially destroyed or obscured ground surface evidence of archaeological resources within the

Project site, intact archaeological resources may potentially exist below the ground surface.” (CRA, page 20).

Therefore, based on the information and analysis provided herein, implementation of Mitigation Measures CUL-1 and CUL-2 will ensure that potential impact to unknown archeological resources will be *less than significant with mitigation* incorporation.

**Mitigation Measures: See Mitigation Measures CUL-1 and CUL-2.**

**c) Would the Project disturb any human remains, including those interred outside of formal cemeteries?**

**Less Than Significant Impact with Mitigation:** There are no known human remains buried in the Project vicinity. The archaeological pedestrian survey results did not identify any prehistoric or historic-period cultural resources within the Project site. The absence of cultural material on the ground surface does not, however, preclude the possibility of Project construction-related activities unearthing subsurface (buried, below ground) archaeological artifacts/resources. If human remains are unearthed during Project construction, there is a potential for a significant impact.

As such, based on the information and analysis provided herein, implementation of Mitigation Measure CUL-2 will ensure that impacts remain *less than significant with mitigation* incorporation.

**Mitigation Measures: See Mitigation Measures CUL-1 and CUL-2.**

**Mitigation Measures: See CUL-1 and CUL-2**

The following Mitigation Measures were developed based on the recommendations provided by qualified consultants Taylored Archaeology as noted in the CRA, pages 34-35.

**Mitigation Measure CUL-1:** In the event that previously unidentified archaeological materials are encountered during development or ground-moving activities in the Project boundary, all work should be halted in the immediate vicinity (100 feet) until a qualified archaeologist can identify the discovery and assess its significance. If determined to be significant, the qualified historical and/or archaeologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines and the City’s Historic Preservation Ordinance.

**Mitigation Measure CUL-2:** If human remains are unearthed during construction-related activities (such as, earth shaping, excavating, grading, trenching, etc.), all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, 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. Also, pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner 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 landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

#### **Cumulative Impact: Less than Significant**

The geographic area of this cumulative analysis is the Visalia General Plan planning area. As noted earlier, the Project site does not include any known historical, cultural, or archaeological resources. Also as noted earlier, this analysis relies on the information, determinations, technical studies, etc., contained in the adopted/certified Visalia General Plan EIR. CHRIS and NAHC search results indicate that there are no known resources on the Project site. However, as an abundance of caution, Mitigation Measures CUL-1 and CUL-2 are incorporated herein to minimize impacts in the unlikely event that any resources applicable to this Checklist Item are inadvertently discovered. Therefore, based on the information and analysis provided herein, and with implementation of Mitigation Measures CUL-1 and CUL-2 as applicable, cumulative impacts of the Project would be *less than significant with mitigation*.

## VI. ENERGY

<b>Would the Project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion in this section is based on the Air Quality, Greenhouse Gas and Health Risk Assessment Technical Memorandum (AQ/GHG/HRA Technical Memorandum) that has been prepared by qualified consultant Core Environmental (Core) for 4Creeks, Inc. (Appendix A).

**Environmental Setting**

Southern California Edison (SCE) provides electricity services to the City of Visalia using electrical facilities networks of both overhead and underground lines. SCE serves approximately 15 million people in a 50,000 square-mile area of Central, Coastal, and Southern California. SCE supplies electricity to its customers through a variety of renewable and nonrenewable sources. Table 3-8 shows the proportion of each energy resource sold to California consumers by SCE in 2022 as compared to the statewide average.

<b>Table 3-8. 2022 SCE and 2022 State Power Resources.</b>			
<b>Fuel Type</b>		<b>SCE Power Mix</b>	<b>California Power</b>
<b>Coal</b>		0%	2.15%
<b>Large Hydroelectric</b>		3.4%	9.24%
<b>Natural Gas</b>		24.7%	36.38%
<b>Nuclear</b>		8.3%	9.3%
<b>Other (Oil/Petroleum Coke/Waste Heat)</b>		0.1%	0.11%
<b>Unspecified Sources of Power<sup>1</sup></b>		30.3%	7.11%
<b>Eligible Renewables</b>	Biomass	0.1%	2.15%
	Geothermal	5.7%	4.67%
	Small Hydro	0.5%	1.12%

<b>Table 3-8. 2022 SCE and 2022 State Power Resources.</b>			
	Solar	17%	17.04%
	Wind	9.8%	10.83%
	<b>Total Eligible Renewable</b>	<b>33.1%</b>	<b>35.81%</b>
1. "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources. <b>Source:</b> SCE; California Energy Commission			

SCE also offers Green Rate Options, which allow consumers to indirectly purchase up to 100 percent of their energy from renewable sources. To accomplish this, SCE purchases the renewable energy necessary to meet the needs of Green Rate participants from solar renewable developers.

Southern California Gas (SoCalGas) Company is available to provide natural gas services to the Project area. Natural gas is an energy source developed from fossil fuels composed primarily of methane (CH<sub>4</sub>). In 2023, approximately 32 percent of the natural gas burned in California was used for electricity generation, while 23 percent is consumed by the residential sector, 31 percent is consumed by the industrial sector, 13 percent is consumed by the commercial sector, and about 1 percent was used in the transportation sector as vehicle fuel (California State Profile and Energy Estimates, 2024). This Project would not use any natural gas appliances within the housing units.

## **Regulatory Setting**

### **Federal**

None that apply to the Project.

### **State**

#### *California Code of Regulations, Title 20*

Title 20 of the California Code of Regulations establishes standards and requirements for appliance energy efficiency. The standards apply to a broad range of appliances sold in California.

#### *California Code of Regulations, Title 24*

Title 24 of the California Code of Regulations is a broad set of standards designed to address the energy efficiency of new and altered homes and commercial buildings. These standards

regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. Title 24 requirements are enforced locally by the City of Selma Building Department.

#### *California Green Building Standards Code (CALGreen)*

CalGreen is a mandatory green building code that sets minimum environmental standards for new buildings. It includes standards for volatile organic compound (VOC) emitting materials, water conservation, and construction waste recycling.

#### *California Senate Bill 100*

SB 100, passed in 2018, set a deadline in 2045 for 100 percent of energy to be renewable. Additionally, by 2030, 60 percent of all energy must be renewable. California is targeting this goal through solar and other renewable sources.

#### *California Assembly Bill 152*

For California to meet its renewable goals, AB 152 was passed in 2018. AB 152 states that starting in 2020 all new low rise residential buildings must be built with solar power. However, AB 152 would not apply as there would be no residential component to the Project2.

### **Regional/Local**

#### *City of Visalia General Plan*

The 2030 General Plan includes the policies related to energy use that correlate to the proposed Project:

- *T-P-41* Integrate the bicycle transportation system into new development and infill redevelopment. Development shall provide short term bicycle parking and long-term bicycle storage facilities, such as bicycle racks, stocks, and rental bicycle lockers. Development also shall provide safe and convenient bicycle and pedestrian access to high activity land uses such as schools, parks, shopping, employment, and entertainment centers.
- *T-P-53* Develop flexible parking requirements in the zoning ordinance for development proposals based on “best practices” and the proven potential to reduce parking demand.

#### *City of Visalia Climate Action Plan*

The Climate Action Plan discusses community measures that encourage energy efficient systems in residential and commercial sectors. The included action is as follows:

- Community-wide Solar PV Bulk Purchasing: Continue to promote community-wide rooftop solar. Continue exploring the potential to collaborate with regional partners on a communitywide solar bulk purchase program.

## **Discussion**

### **a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?**

**Less Than Significant Impact:** The proposed Project includes the construction and operation of an expanded TCOE/AOCC facility as summarized earlier. During Project construction-related activities, there would be an increase in energy consumption related to worker trips and the operation of construction equipment. This increase in energy use would be temporary and limited to the greatest extent feasible through compliance with local, state, and federal regulations. Vehicle fuel consumption during Project construction was estimated based on the assumed construction schedule, vehicle trip lengths, and the number of workers per construction phase.

The California Energy Commission estimates Tulare County residential uses consumed approximately 1.45 million MWh of electricity and 51 million Therms of natural gas in 2021. (see: California Energy Commission. Energy Consumption by County. Accessed at: <https://ecdms.energy.ca.gov/elecbycounty.aspx> and <https://ecdms.energy.ca.gov/gasbycounty.aspx>).

According to the U.S. Energy Information Administration, California residential uses consumed approximately 100 million MWh of electricity and approximately 4.6 billion Therms of natural gas in 2021. Per capita, the Project's estimated electricity demand is similar to California's demand (2.41 MWh/yr) but higher than Tulare County's demand (3.19 MWh/yr). The Project will predominantly rely on electricity, as such, it would not result in a natural gas demand. Operation of the proposed Project would result in the consumption of vehicle fuel from employees and visitors leaving and coming to the site.

<b>LAND USE</b>	<b>ELECTRICITY (kWh/yr)</b>	<b>NATURAL GAS (kBTU/yr)</b>
Government Office Building (Conference Center)	2,084,306	3,968,973
Junior College (Classrooms)	64,808	277,206
Unrefrigerated Warehouse-No Rail	187,044	581,580
Parking Lot	70,255	0
<b>TOTAL</b>	<b>2,406,413</b>	<b>4,827,759</b>
<sup>1</sup> Table 5 AQ/GHG/HRA Memorandum, Appendix A of this document kWh/yr = kilowatt hours per year kBTU/yr = thousand British Thermal Units per year		

During operations-related activities, the proposed Project is not anticipated to result in wasteful fuel consumption. Because construction-related energy use would be short-term, temporary, intermittent, limited to the greatest extent feasible through consistency with Federal, State, and local policies related to energy conservation, operation of the project will comply with all energy efficiency standards required under Title 24, Section 6. These standards were specifically developed to achieve net zero energy for residential projects, as such, it can reasonably be concluded that the proposed Project will achieve net zero energy. The proposed Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. The impact will be less than significant.

While construction of the proposed Project will result in additional energy consumption, this energy use is not unnecessary or inefficient. This energy use is justified by the energy-efficient nature of the proposed Project, which will be predominantly reliant on electricity, rather than natural gas for all operational components. The California Energy Commission is responsible for the development and enforcement of specific strategies to create energy efficient buildings for new residential and non-residential development. These strategies are implemented through Title 24, Part 6 of the California Building Code, which requires developers to include certain measures (including solar panels on all new residential buildings) to achieve required building efficiency standard.

As shown in Table 3-9, annual energy use associated with Project operations would total approximately 4,827,759 MMBTUs per year. Annual energy use is expected to decrease over time as a result of improvements in vehicle fuel efficiency standards. The proposed Project will be subject to energy conservation requirements in the California Energy Code (24 CCR Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (CALGreen) (24 CCR Part 11). Adherence to Title 24 requirements would ensure that the Project would not result in wasteful or inefficient use of energy resources due to building operation or vehicle trips. Additionally, the operational component of the Project will predominantly rely on electricity. (California Energy Commission 2025 Building Energy Efficiency Standards for Residential and Nonresidential Buildings: Title 24, Part 6, and Associated Administrative Regulations in Part 1 see:

<https://www.energy.ca.gov/publications/2025/2025-building-energy-efficiency-standards-residential-and-nonresidential>

Because construction-related energy use would be short-term, temporary, intermittent and limited to the greatest extent feasible through consistency with Federal, State, and local policies related to energy conservation, and operation of the Project will comply with all energy efficiency standards required under Title 24, Part 6, and these standards were specifically developed to achieve net zero energy for residential Projects. Therefore, based on the AQ/GHG/Energy Study prepared by qualified consultant Core, and the information

and analysis provided herein, the Project would not result in inefficient, unnecessary, or wasteful energy use. The impact would be *less than significant*.

**Mitigation Measures: None required.**

Based on AQ/GHG/HRA Technical Memorandum prepared by qualified consultant Core, and the information and analysis provided herein, *no mitigation measures would be required*.

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

**No Impact:** The proposed Project would not conflict with or obstruct any state or local plans for renewable energy or energy efficiency. The construction- and operations-related components of the Project would comply with applicable energy efficiency regulations included in CALGreen, Title 24, CARB, and the Visalia General Plan. The proposed Project would comply with applicable state and local policies related to energy efficiency. Based on AQ/GHG/HRA Technical Memorandum prepared by qualified consultant Core, and the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**Mitigation Measures: None required.**

Based on AQ/GHG/HRA Technical Memorandum prepared by qualified consultant Core, and the information and analysis provided herein, *no mitigation measures would be required*.

**Cumulative Impact: Less than Significant**

The geographic areas for this cumulative analysis are the City of Visalia and County of Tulare. Project-related GHG emissions are not confined to a particular air basin but are dispersed worldwide. As noted in the San Joaquin Valley Air District's *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA*, GHG emissions and global climate change inherently represent cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the GHG emissions from past, present, and reasonably foreseeable future projects and activities have contributed to and would contribute to global climate change and its associated environmental impacts. According to the Valley Air District, project GHG emissions are inherently cumulative and do

not require the estimation of cumulative projects in the region of the project. Thus, the determination of GHG cumulative impacts is based on: the State target established by AB 32 to reduce GHG emissions to 1990 levels by 2020, SB 32 to reduce GHG emissions to at least 40 percent below the Statewide greenhouse gas emissions limit no later than December 31, 2030, and AB 1279 which required the State to reduce GHG emissions to at least 85 percent below 1990 levels by 2045. In order to ensure that this goal would be achieved, as discussed earlier, Air Districts and Lead Agencies developed GHG thresholds to ensure compliance with the State target.

Therefore, impacts under impact discussion Item VI a) are not project-specific impacts to global warming, but are the proposed Project's contribution to this cumulative impact. Implementation of the proposed Project would result in a regional and global contribution to GHG emissions. The proposed Project would incrementally contribute to adverse impacts on energy resource demand and conservation when considering the cumulative impact of concurrently planned projects; however, like the proposed Project, discretionary actions requiring agency approval are required to comply with local, regional, state, and federal policies designed to reduce wasteful energy consumption, and improve overall energy conservation and sustainability. For instance, all local projects involving the development of new buildings must be designed to conform to CALGreen and the current California Energy Code (for this Project it will be the 2024 Code). Therefore, it is anticipated that the Project's contribution to cumulative impacts would not result in a significantly considerable wasteful use of energy resources, such that the Project, and other cumulative projects, would not have a cumulative effect on energy conservation. The proposed Project will not have a direct or cumulative impact, or create wasteful, inefficient, or unnecessary consumption of energy resources during project construction-related activities or operations, nor will it conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, Project-specific and Cumulative Impacts as of a result of the Project would be less than significant

This Project is limited to a 28-acre site surrounded by existing development and would be consistent with an infill project as it is directly adjacent to the existing TCOE facility that is already on urbanized land within the Mooney Boulevard/SR 63 corridor. In summary, the Project is localized in nature, it does not cover a broad-based area (e.g. not County- or region-wide), and its emissions will include short-term, temporary, and intermittent construction-related activity emissions which will end upon cessation of construction-related activities. Operational emissions are projected to remain below established thresholds. Therefore, based on AQ/GHG/HRA Technical Memorandum prepared by qualified consultant Core, and the information and analysis provided herein, and although not significant in and of itself, overall cumulative impact would be *less than significant*.

## VII. GEOLOGY AND SOILS

<b>Would the Project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct and indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Environmental Setting***Geologic Stability and Seismic Activity*

- **Seismicity**

The Visalia Planning Area has no known major fault systems within its boundaries. There are small faults in the Southern San Joaquin Valley, approximately 30 miles away, though none of them are known to be active. The greatest potential for seismic activity in Visalia Planning Area is posed by the San Andreas Fault, approximately 65 miles away from the site, or the Owens Valley Fault Group, which is located approximately 75 miles away from the Project site.

- **Liquefaction**

Liquefaction is a phenomenon whereby unconsolidated and/or near saturated soils lose cohesion and are converted to a fluid state as a result of severe vibratory motion. The relatively rapid loss of soil shear strength during strong earthquake shaking results in temporary, fluid-like behavior of the soil, which can result in landslides and lateral spreading. Soil liquefaction causes ground failure that can damage roads, pipelines, underground cables, and buildings with shallow foundations. Liquefaction hazards may exist in and around wetland areas and creeks, though soil types are generally too coarse or too high in clay content, and not likely to be subject to sufficient acceleration to cause liquefaction.

- **Landslides**

Landslides refer to a wide variety of processes that result in the downward and outward movement of soil, rock, and vegetation under gravitational influence. Landslides are caused by both natural and human-induced changes in slope stability and often accompany other natural hazard events, such as floods, wildfire, or earthquakes. Due to little elevation changes throughout the planning area, including the proposed Project site, it is considered a low landslide hazard area. The 2023 Tulare Multi-Jurisdictional Local Hazard Mitigation Plan states that occurrence of landslide events within populated areas of Tulare County is unlikely and the magnitude and significance is low.

- **Subsidence**

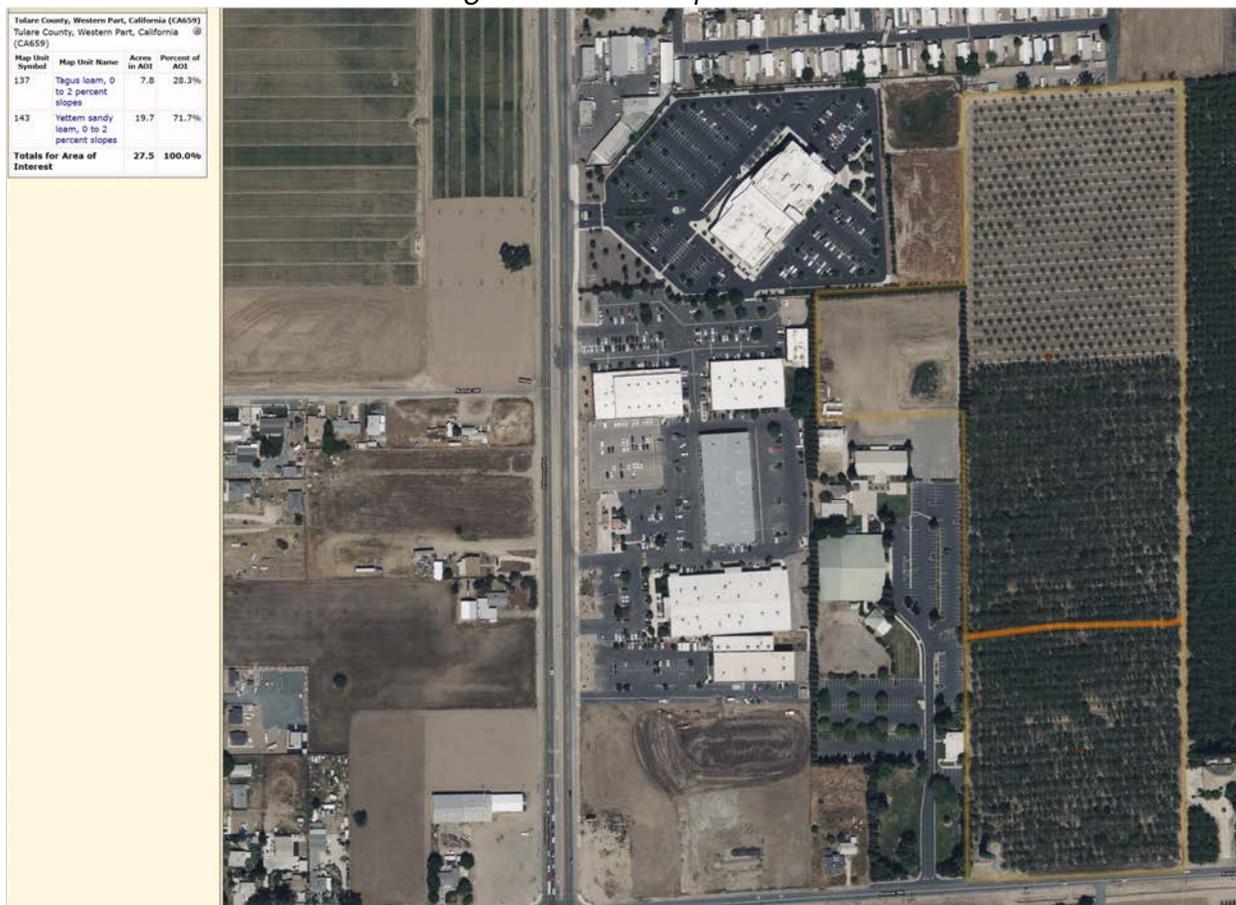
Land Subsidence refers to the vertical sinking of land because of either manmade or natural underground voids. Subsidence has occurred throughout the Central Valley because of groundwater, oil, and gas withdrawal. The Kaweah Subbasin that underlies the Project area is in an overdraft condition on an average long-term basis. According to the most recent Urban Water Management Plan (UWMP), groundwater elevations have declined up to 50 feet between 1990 and 2010. While groundwater recharge efforts are in progress, groundwater levels will continue to decline unless recharge is increased.

### *Soils Involved in Project*

According to the USDA/NRCS (see USDA NRCS Tulare County ,Western Part, California (CA659) accessed at: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>), two soil types within the Project area include:

- **137 Tagus loams**, 0 to 2 percent slopes, prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season, fan remnants, alluvium derived from granitic rock sources, well drained, low runoff, very rare flooding, no frequent ponding, land capability classification (irrigated) 1; non-irrigated (4c). Approximately 28 percent of the Project area is classified as having this soil type.
- **143 Yettem sandy loam**, 0 to 2 percent slopes, prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season, flood plain, alluvial fans, alluvium derived from granite, well drained, very low runoff, very rare flooding, no frequent ponding, land capability classification (irrigated) 1; (non-irrigated) 4(c). Approximately 72 percent of the Project area is classified as having this soil type.

Figure 3-2 Soils Map



Source: USDA NRCS Tulare County ,Western Part, California (CA659) accessed at: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

## **Regulatory Setting**

### **Federal**

None that apply to the Project.

### **State**

#### *California Building Code*

The California Building Code (CBC) contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. CBC provisions provide minimum standards to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment.

### **Regional/Local**

*City of Visalia Municipal Code (California Building Code)*

The City of Visalia Municipal Code has incorporated and adopted the CBC, 2022 Edition, as promulgated by the California Building Standards Commission, which incorporates the adoption of the 2021 edition of the of the International Building Code, as amended with necessary California amendments and the 2021 International Building Code of the International Code Council.

*City of Visalia General Plan*

The 2030 General Plan includes the policies related to geology and soils that correlate to the proposed Project:

- *OSC-P-28*: Require new development to implement measures, as appropriate, to minimize soil erosion related to grading, site preparation, landscaping, and construction.

**Discussion**

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

- i. 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.**

**Less Than significant Impact:** The Project is in an area of relatively low seismic activity, and the Project site has a low chance of being affected by ground shaking from distant faults. The potential for strong seismic ground shaking on the Project site is not a significant environmental concern due to the infrequent seismic activity of the area and distances to the faults. The Project does not propose any components which could cause substantial adverse effects in the event of an earthquake. Additionally, based on the Project has an unlikely potential to be impacted by the rupture of an earthquake fault indirectly or directly. Therefore, based on the information and analysis provided herein, there would be *a less than significant* related to the risk of loss, injury or death involving a rupture of a known earthquake fault.

- ii. Strong seismic ground shaking?**

**No Impact:** The Project site is in an area of low seismic activity according to the Tulare County Multi-Jurisdictional Local Hazard Mitigation Plan. The proposed Project does not

include any activities or components that would indirectly or directly result in loss, injury or death from strong seismic ground shaking, as the Project is in a low-risk area for seismic activity. Therefore, based on the information and analysis provided herein, the impact would be *less than significant*.

**iii. Seismic-related ground failure, including liquefaction?**

**No Impact:** The risk of liquefaction within the planning area outside is low because the soil types are generally unsuitable for liquefaction. The area's low potential for seismic activity would further reduce the likelihood of liquefaction occurrence. Because the Project site is within an area of low seismic activity, and the soil associated with the Project area is not suitable for liquefaction. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**iv. Landslides?**

**No Impact:** The Planning Area of Visalia is considered a low-risk area for landslides. Additionally, the Project site is generally flat and there are no hill slopes in the area. No geologic landforms exist on or near the site that would result in a landslide event. As a result, there is very low potential for landslides. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**b) Would the Project result in substantial soil erosion or the loss of topsoil?**

**Less Than Significant Impact:** Because the Project site is relatively flat and the soils that occupy the site have only a slight susceptibility to erosion, the potential for erosion is low. Construction-related activities and increased impermeable surfaces can increase the probability for erosion to occur both on and off the Project site. Construction-related impacts related to erosion will be temporary and subject to best management practices (BMPs) required by a SWPPP, which are developed to prevent significant impacts related to erosion from construction-related activities. Impacts related to erosion during the construction phase would be short-term, temporary, and intermittent; and BMPs required by the SWPPP would prevent significant impacts. Though increased impermeable surfaces will increase stormwater runoff on the site, the Project will include features such as landscaping and the extension of/connection to the existing stormwater system to offset these potential impacts. Therefore, based on the information and analysis provided herein, the impact would be *less than significant*.

- c) Would the Project 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?**

**No Impact:** The soils associated with the Project site are considered stable and have a low capacity for landslides, lateral spreading, subsidence, liquefaction, or collapse. The Project area is stable, and this Project would not result in a substantial grade change to the topography to the point that it would increase the risk of landslides, lateral spreading, subsidence, liquefaction or collapse. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

- d) Would the Project 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?**

**No Impact:** The proposed Project site is not in an area with expansive soils. The soils associated with the Project do not exhibit shrink swell behavior, as such development of the Project will pose no risk to life or property caused by expansive soils. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

- e) 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 proposed Project would not include the use of septic tanks or any other alternative wastewater disposal systems. The proposed Project would tie into Visalia's existing sewer services. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**f) Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Less Than Significant Impact with Mitigation:** There are no unique geologic features, and no known paleontological resources located within the Project area. However, there is the possibility that paleontological resources may exist subsurface and may be inadvertently unearthed during the construction-related activities. In the unlikely event of encountering a paleontological resource, implementation of Mitigation Measure CUL-1 would avoid or minimize impacts caused by development of the Project. Therefore, based on the information and analysis provided herein, an impact to the paleontological resource would be *less than significant with mitigation*.

**Mitigation Measures:** See Mitigation Measures discussion.

**Mitigation Measures: CUL-1 (Paleontological Resources)**

**Mitigation Measure CUL-1:** In the event of accidental discovery of unidentified archaeological remains during development or ground-moving activities in the Project boundary, all work shall be halted in the immediate vicinity until a qualified archaeologist can identify the discovery and assess its significance. If determined to be significant, the qualified historical and or archaeologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines and the City's Historic Preservation Ordinance.

**Cumulative Impact: Less than significant with mitigation**

The geographic area of this cumulative analysis is the Visalia General Plan planning area. As noted earlier, the Project site does not include or is near typical contributors to geological events. The area does not lie within known earthquake faults, it is not susceptible to strong seismic ground shaking or seismic-related ground failure, including liquefaction or landslides. Soil types; topography (generally flat); the absence and distance to the nearest faults; the absence of hill slopes; and absence of geologic landforms/natural materials are not conducive or would contribute to landslide events. Further, the Project would be required to implement a Stormwater Pollution Prevention Plan (including Best Management Practices) as erosion controls. However, it remains unknown if there would be an impact to paleontological resources as subsurface discovery cannot be totally eliminated. Although the CRA noted that there are no known historic, cultural, tribal cultural, or paleontological resources on the Project site. However, Mitigation Measure CUL-1 is incorporated herein as an abundance of caution to minimize impacts in the unlikely event that paleontological resources are inadvertently discovered. Therefore, based on the information and analysis provided herein, and with implementation of Mitigation Measure CUL-1, as applicable, cumulative impacts of the Project would be *less than significant with mitigation*.



## VIII. GREENHOUSE GAS EMISSIONS

<b>Would the Project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Environmental Setting**

In addition to references of the Visalia General Plan and its accompanying EIR, the analysis in this section is supplemented by a Health Risk Assessment (HRA), (which includes California Emission Estimator Model (CalEEMOD) results), contained in the AQ/GHG/HRA Memorandum prepared by qualified consultants Core Environmental Consulting, Inc., that has been prepared for 4Creeks, Inc. and can be found in Appendix A.

Natural processes and human activities emit greenhouse gases. The presence of GHGs in the atmosphere affects the earth's temperature. Without the natural heat-trapping effect of GHGs, the earth's surface would be about 34°C cooler. However, it is believed that emissions from human activities, such as electricity production and vehicle use, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations.

The effect of greenhouse gases on earth's temperature is equivalent to the way a greenhouse retains heat. Common GHGs include water vapor, carbon dioxide, methane, nitrous oxide, ozone, chlorofluorocarbons, hydro chlorofluorocarbons, hydro fluorocarbons, per fluorocarbons, sulfur, and hexafluoride. Some gases are more effective than others. The Global Warming Potential (GWP) has been calculated for each greenhouse gas to reflect how long it remains in the atmosphere, on average, and how strongly it absorbs energy. Gases with a higher GWP absorb more energy, per pound, than gases with a lower GWP, and thus contribute more to global warming. For example, one pound of methane is equivalent to twenty-one pounds of carbon dioxide.

GHGs as defined by AB 32 include the following gases: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. GHGs as defined by AB 32 are summarized in Table 3-10. Each gas' effect on climate change depends on three main factors.

The first being the quantity of these gases are in the atmosphere, followed by how long they stay in the atmosphere and finally how strongly they impact global temperatures.

<b>Table 3-10. Greenhouse Gases</b>				
<b>Greenhouse Gas</b>	<b>Description and Physical Properties</b>	<b>Lifetime</b>	<b>GWP</b>	<b>Sources</b>
Methane (CH <sub>4</sub> )	Is a flammable gas and is the main component of natural gas	12 years	21	Emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and by the decay of organic waste in municipal solid waste landfills.
Carbon dioxide (CO <sub>2</sub> )	An odorless, colorless, natural greenhouse gas.	30-95 years	1	Enters the atmosphere through burning fossil fuels (coal, natural gas, and oil), solid waste, trees and wood products, and also as a result of certain chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (or "sequestered") when it is absorbed by plants as part of the biological carbon cycle.
Chloro-fluorocarbons	Gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are non-toxic nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the earth's surface).	55-140 years	3,800 to 8,100	Were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. They destroy stratospheric ozone.
Hydro-fluorocarbons	A man-made greenhouse gas. It was developed to replace ozone-depleting gases found in a variety of appliances. Composed of a group of greenhouse gases containing carbon, chlorine and at least one hydrogen atom.	14 years	140 to 11,700	Powerful greenhouse gases that are emitted from a variety of industrial processes. Fluorinated gases are sometimes used as substitutes for stratospheric ozone-depleting substances. These gases are typically emitted in smaller quantities, but because they are potent greenhouse gases.

<b>Greenhouse Gas</b>	<b>Description and Physical Properties</b>	<b>Lifetime</b>	<b>GWP</b>	<b>Sources</b>
Nitrous oxide (N <sub>2</sub> O)	Commonly known as laughing gas, is a chemical compound with the formula N <sub>2</sub> O. It is an oxide of nitrogen. At room temperature, it is a colorless, non-flammable gas, with a slightly sweet odor and taste. It is used in surgery and dentistry for its anesthetic and analgesic effects.	120 years	310	Emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste.
Pre-fluorocarbons	Has a stable molecular structure and only breaks down by ultraviolet rays about 60 kilometers above Earth's surface.	50,000 years	6,500 to 9,200	Two main sources of pre-fluorocarbons are primary aluminum production and semiconductor manufacturing.
Sulfur hexafluoride	An inorganic, odorless, colorless, and nontoxic nonflammable gas.	3,200 years	23,900	This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing and as a tracer gas.

*Source: EPA, Intergovernmental Panel on Climate Change*

Regarding the quantity of these gases in the atmosphere, we first must establish the amount of the particular gas in the air, known as Concentration, or abundance, which are measured in parts per million, parts per billion and even parts per trillion. To put these measurements in more relatable terms, one part per million is equivalent to one drop of water diluted into about 13 gallons of water, roughly a full tank of gas in a compact car. Therefore, it can be assumed larger emissions of greenhouse gases lead to a higher concentration in the atmosphere.

Each of the designated gases described above can reside in the atmosphere for different amounts of time, ranging from a few years to thousands of years. All these gases remain in the atmosphere long enough to become well mixed, meaning that the amount that is measured in the atmosphere is roughly the same all over the world regardless of the source of the emission.

### **Regulatory Setting**

#### **Federal**

None that apply to the Project.

#### **State**

### *California Assembly Bill 32*

AB 32 set the 2020 greenhouse gas emissions reduction goal into law. It directed the California Air Resources Board to begin developing discrete early actions to reduce greenhouse gases while also preparing a scoping plan to identify how best to reach the 2020 limit. The reduction measures to meet the 2020 target are to be adopted by the start of 2011.

### *California Senate Bill 1078 and SB 107, and Executive Order S-14-08*

SB 1078, SB 107, and Executive Order S-14-08 require California to generate 20 percent of its electricity from renewable energy by 2017. SB 107 then changes the 2017 deadline to 2010. Executive Order S-14-08 required that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020.

## **Regional/Local**

### *San Joaquin Valley Air Pollution Control District*

SJVAPCD adopted a Climate Change Action Plan (CCAP) in August 2008. While the plan does not have regulatory powers, it directs SJVAPCD to develop guidance to assist District staff, valley businesses, land-use agencies, and other permitting agencies in addressing GHG emissions as part of the CEQA process.

### *City of Visalia Climate Action Plan (CAP)*

Visalia's draft 2013 CAP includes a baseline GHG emissions inventory of municipal and community emissions, identification, and analysis of existing and proposed GHG reduction measures, and reduction targets to help Visalia work toward the State's goal of an 80 percent reduction below baseline emissions by 2050. The plan sets 2020 and 2030 reduction targets, and includes reduction actions for energy, transportation, and waste and resource conservation.

### *City of Visalia Climate Change Initiatives*

In January 2007, Visalia's mayor signed the "Cool Cities" pledge, part of the U.S. Mayors Climate Protection Agreement. By entering into this agreement, the City has adopted the goal of reducing citywide GHG emissions to 7 percent below 1990 levels by 2012. As detailed in the CAP, this goal was subsequently expanded in response to ARB's recommended reduction target of 15 percent below the 2005 baseline, and the City added a 2030 mitigation target to correlate with the 2030 General Plan Update and the goal of achieving an 80 percent reduction by 2050.

## **Discussion**

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

**Less Than Significant Impact:**

**Construction.** As noted in AQ/GHG/HRA Memorandum in Appendix A prepared by qualified consultants Core, "Greenhouse Gases (GHG), Vehicle Miles Travelled (VMT), and Energy use were all estimated using CalEEMod, as described in the Criteria Pollutants section above. The full detailed report is included in Attachment 2 CalEEMod Results [in the AQ/GHG/HRA Memorandum]...As discussed in the Criteria Pollutants section above [in the AQ/GHG/HRA Memorandum], emissions are expected to be even lower with implementation of all State, regional, and local measures." (AQ/GHG/HRA Memorandum, page 6).

The AQ/GHG/HRA Memorandum in Appendix A includes CalEEMod Emissions which calculates that this Project will create a maximum of 342 MT of CO<sub>2</sub>e emissions during the "worst year" of construction-related activities. Greenhouse gases would be predominantly generated during construction-related activities including earthmoving operation during site preparation (such as grading, trenching, earth shaping, etc.); building construction; application of architectural coatings; and paving.

As provided in the CalEEMOD results included in Appendix A, the proposed Project would have the following construction greenhouse gas emissions:

- CO<sub>2</sub>: 339 metric tons per year
- CH<sub>4</sub>: 0.01 metric tons per year
- N<sub>2</sub>O: 0.01 metric tons per year
- CO<sub>2</sub>e: 342 metric tons per year (combined CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O emissions w/ some margin of error due to rounding differences and addition of Global Warming Potential). (see AQA/GHG/HRA Memorandum, page 6).

"Because the SJVAPCD does not have numeric thresholds for assessing the significance of construction related GHG emissions, predicted emissions from Project construction were compared to SJVAPCD thresholds for construction related GHG emissions. The SJVAPCD currently has a threshold of 10,000 metric tons of CO<sub>2</sub>e per year for construction emissions amortized over a 30-year Project lifetime. Because Project construction would generate less GHG emissions than this threshold, impacts related to GHG emissions during Project construction would be less than significant.

**Operation.** As provided in the CalEEMOD results included in Appendix A, the proposed Project would have the following operational greenhouse gas emissions:

- CO<sub>2</sub>: 339 metric tons per year
- CH<sub>4</sub>: 2.35 metric tons per year
- N<sub>2</sub>O: 0.42 metric tons per year

- CO<sub>2</sub>e: 5,979 metric tons per year (combined CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O emissions w/ some margin of error due to rounding differences and addition of Global Warming Potential). (see AQ/GHG/HRA Memorandum, page 6).

The SJVAPCD has not formally provided guidance on how to analyze GHG emissions impacts for Projects within their San Joaquin Valley Air Basin (SJVAB). Until such time as SJVAPCD provides formal guidance, the following alternative metrics used by air districts in California to assess GHG emissions impacts have been identified:

Therefore, based on the AQ/GHG/HRA Memorandum, and the information and analysis provided herein, the Project would result in a *less than significant impact*.

**Mitigation Measures: None required.**

Based on the AQ/GHG/HRA Memorandum, and the information and analysis provided herein, *no mitigation measures would be required*.

**b) Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**Less than Significant:** The Project will be consistent with all applicable plans, policies, and regulations, particularly the Climate Action Plan, which is included as part of the City of Visalia General Plan. Table 3-11 below demonstrates the consistency of the Project with all the applicable policies and goals of the City of Visalia General Plan & Climate Action Plan.

<b>Table 3-4. Project Consistency with Climate Action Plan Strategies</b>	
<b>Climate Action Plan Measures</b>	<b>Project Consistency with Strategy</b>
<b>Landscaping/Urban Greening</b>	
<b>Urban Forestry:</b> Requirement for all new development to have street trees, require shade over at least 25 percent of area in city pocket parks.	<b>Consistent.</b> The proposed Project plans to provide trees on all local roads and include improvements on existing roads as well as in planned pocket park.
<b>Energy Systems</b>	
<b>Community-wide Solar PV Bulk Purchasing:</b> Continue to promote community-wide rooftop solar. Continue exploring the potential to collaborate with regional partners on a community-wide solar bulk purchase program.	<b>Consistent.</b> The Project buildings would be designed to accommodate solar panels and would be compliant with Title 24 requirements for building efficiency.
<b>ENERGY STAR Appliances &amp; Equipment:</b> Promote purchasing of energy efficient	<b>Consistent.</b> The proposed Project may use a limited amount natural gas for its kitchen

<b>Table 3-4. Project Consistency with Climate Action Plan Strategies</b>	
<b>Climate Action Plan Measures</b>	<b>Project Consistency with Strategy</b>
<i>(e.g. ENERGY STAR) home and office appliances and equipment.</i>	classrooms during its operational phase and will predominantly rely on electricity. Where applicable, the Project will contain energy efficient appliances with an ENERGY STAR certification. There is little/no price difference between ENERGY STAR and conventional equipment, but significant energy efficiency differences.
<b>Waste &amp; Resource Conservation</b>	
<b>Water Efficient Landscaping Policy:</b> <i>Continue working to reduce the amount of water used for landscaping through the development of a local Water Efficient Landscape Ordinance, updates to the Landscape Standards, and enforcement of the Water Conservation Ordinance.</i>	<b>Consistent.</b> The proposed development will include landscaped areas that will prioritize drought tolerant plant species and follow the local Water Conservation requirements and stages detailed in the City's Municipal Code.

The Project would not generate a cumulatively considerable GHG impact, nor would it conflict with any applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Therefore, based on the AQ/GHG/HRA Memorandum, and the information and analysis provided herein, the impact would be *less than significant*.

**Mitigation Measures: None required.**

Based on the AQ/GHG/HRA Memorandum, and the information and analysis provided herein, *no mitigation measures would be required*.

**Mitigation Measures: None required.**

Based on the AQ/GHG/HRA Memorandum, and information and analysis provided herein, *no mitigation measures would be required*.

**CUMULATIVE IMPACT: Less than Significant**

The cumulative area is the San Joaquin Valley Air Basin and the entire state of California. However, it would be speculative to estimate the Project's impact on a global scale. Both the Tulare County and Visalia General Plans environmental impact reports (EIR) have accounted for population growth, and subsequent development to accommodate that growth, and have determined GHG impacts are unavoidable. Individually, projects may not exceed any air quality thresholds on a regional level; however, when combined with similar

nearby projects, an exceedance could occur on a local level. As both the County's and City's General Plans anticipated and have accounted for residential development over time, the Project would be consistent with the County's and City's General Plans EIRs regarding GHG. As noted earlier, GHG would be generated during construction-related activities including earthmoving operation during site preparation (such as grading, trenching, earth shaping, etc.); building construction; application of architectural coatings; and paving; however, these construction-related activities would be short-term, temporary, and intermittent until the Project is built out (that is, fully constructed). The Project would result in the development of 149,200 square feet of structures (108,000 square feet of office and conference room space, three classrooms with a training kitchen totaling 6,200 square feet, and approximately 35,000 square feet of warehouse space) on approximately 28 acres. The overall intent is to expand and provide additional training, warehousing, and conference opportunities by TCOE for the existing TCOE/AOCC facilities in an urbanized area to be annexed into the City's planned growth areas, and minimizes urban sprawl as the Project is currently directly adjacent to existing TCOE facilities and existing mixed commercial uses to the northwest and south and existing residential development to the north. Individually, the Project would not generate greenhouse gas emissions that would exceed GHG thresholds, either directly or indirectly; and it would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Further, as noted earlier in Table 3-15, the Project would be consistent with the Climate Action Plan strategies. Therefore, based on the AQ/GHG/HRA Memorandum, and the information and analysis provided herein, the Project would result in a *less than significant cumulative impact*.

## IX. HAZARDS AND HAZARDOUS MATERIALS

<b>Would the Project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard or excessive noise to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 result in a safety hazard for people residing or working in the Project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

In addition to references of the Visalia General Plan and its accompanying EIR, the analysis in this section is supplemented by a Health Risk Assessment (HRA) prepared by qualified consultants Core Environmental Consulting (see Appendix A) is used to support the findings of this section.

## **Environmental Setting**

The proposed Project site is located approximately 1.39 miles southeast of the nearest school (Cottonwood Creek Elementary School) and approximately 4.9 miles southeast of Visalia Municipal Airport. Additionally, the Project site is located approximately 3.75 miles southeast of the Kaweah Delta Helipad (at the Kaweah Health Medical Center) which is used for patient emergencies to and from the hospital.

The Department of Toxic Substances Control's (DTSC's) EnviroStor was used to identify any sites known to be associated with releases of hazardous materials or wastes within the Project area. The DTSC's search confirmed that the Project would not be located on or near a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

## **Regulatory Setting**

### **Federal**

*Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S. Code [U.S.C.] §9601 et seq.).*

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, or the Superfund Act) authorizes the President to respond to releases or threatened releases of hazardous substances into the environment.

*Occupational Safety and Health Administration (OSHA)*

The Occupational Safety and Health Administration (OSHA) sets and enforces Occupational Safety and Health Standards to assure safe working conditions. OSHA provides training, outreach, education, and compliance assistance to promote safe workplaces. The proposed Project would be subject to OSHA requirements during construction, operation, and maintenance.

*Toxic Substances Control Act of 1976 (15 U.S.C. §2601 et seq.).*

The Toxic Substance Control Act was enacted by Congress in 1976 and authorizes the EPA to regulate any chemical substances determined to cause an unreasonable risk to public health or the environment.

*Hazardous Waste Control Law, Title 26.*

The Hazardous Waste Control Law creates hazardous waste management program requirements. The law is implemented by regulations contained in Title 26 of the California Code of Regulations (CCR), which contains requirements for the following aspects of hazardous waste management:

- Identification and classification;
- Generation and transportation;
- Design and permitting of recycling, treatment, storage, and disposal facilities;
- Treatment standards;
- Operation of facilities and staff training; and
- Closure of facilities and liability requirements.

## **State**

*California Code of Regulations, Title 22, Chapter 11.*

Title 22 of the California Code of Regulations contains regulations for the identification and classification of hazardous waste. The CCR defines a waste as hazardous if it has any of the following characteristics: ignitability, corrosivity, reactivity, and/or toxicity.

*California Emergency Services Act*

The California Emergency Services Act created a multi-agency emergency response plan for the state of California. The Act coordinates various agencies, including CalEPA, Caltrans, the California Highway Patrol, regional water quality control boards, air quality management districts, and county disaster response offices.

*Hazardous Materials Release Response Plans and Inventory Law of 1985*

Pursuant to the Hazardous Materials Release Response Plans and Inventory Law of 1985, local agencies are required to develop "area plans" for response to releases of hazardous materials and wastes. Tulare County maintains a Hazardous Material Incident Response Plan to coordinate emergency response agencies for incidents and requires the submittal of business plans by persons who handle hazardous materials.

*Department of Toxic Substance Control (DTSC)*

A search of the DTSC's Envirostor website indicates that there are no hazardous conditions on the proposed Project site. However, a nearby site approximately 1/3 of a mile southwest of the southernmost area of the Project site is being investigated via DTSC guidance documents for evaluating new school sites. Padre Associates, Inc. (Padre), on behalf of Tulare County Office of Education (TCOE), prepared a Preliminary Environmental Assessment (PEA) Workplan for the TCOE new school facility (i.e., the new school site located at 26277 North Mooney Boulevard] located at Visalia, Tulare County, California.)

The new school site consists of approximately 18-acres. TCOE plans to develop a new school facility for handicapped students, consisting of 10 classrooms for approximately 100 students. Construction of the facility is anticipated to begin in April 2026, with an anticipated school opening date of April 2027. Municipal water will be provided to the school site. Wastewater will be treated by an onsite septic system, with the possibility of connecting to the municipal system in the future. On August 8, 2025, the DTSC received and subsequently approved the PEA Workplan on August 14, 2025 (see: State of California. Department of Toxic Substance Control (DTSC at: [https://www.envirostor.dtsc.ca.gov/public/profile\\_report.asp?global\\_id=60003860](https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60003860) and [https://www.envirostor.dtsc.ca.gov/public/final\\_documents2?global\\_id=60003860&doc\\_id=60590605](https://www.envirostor.dtsc.ca.gov/public/final_documents2?global_id=60003860&doc_id=60590605)).

## **Regional/Local**

### *City of Visalia General Plan*

The City of Visalia General Plan includes the following policies regarding hazards and hazardous materials:

- *PSCU-P-53*: Continue to support the Tulare County Environmental Health Division in protecting groundwater by promoting responsible use, storage and disposal of household hazardous materials.
- *PSCU-P-70*: Continue the City's partnership with the Tulare County Household Hazardous Waste (HHW) program and support the proper disposal of hazardous household waste and waste oil through public education, the disposal facility, and collection services.
- *S-O-3*: Protect soils, surface water, and groundwater from contamination from hazardous materials.

### *City of Visalia Municipal Code*

The City's noise ordinance establishes exterior and interior noise level standards that are measured in terms of Day-Night Average Sound Level (DNL) and Community Noise Equivalent Level (CNEL) or the cumulative noise exposure over a 24-hour period, with adjustments to reflect the added intrusiveness of noise during certain times of the day. The Ordinance mandates that noise sensitive land uses (i.e., residential uses, churches, hospitals, schools, and libraries) may not be exposed to noise levels above 65 dB DNL/CNEL at any given time.

## **Discussion**

### **a) Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**Less than Significant Impact:** Project construction-related activities may involve the use, storage, and transport of hazardous materials. During construction-related activities, the contractor will likely use fuel trucks to refuel onsite equipment and also use paints and solvents. The storage, transport, and use of these materials is short-term and temporary and will be required to comply with local, state, and federal regulatory requirements. There is the potential for leaks due to refueling of construction equipment; however, standard construction Best Management Practices (BMPs) included in the SWPPP will reduce the potential for the release of construction-related fuels and other hazardous materials by controlling runoff from the site and requiring proper disposal or recycling of hazardous materials. As this can be summarized as an administration and conference center development Project, as such, the use and storage of potentially hazardous substances (such as pesticides, fertilizers, and cleaning agents) will likely be used in limited amounts per the manufacturer's instructions regarding application rates for typical maintenance of these types of uses. Therefore, based on the information and analysis provided herein, the impact would be *less than significant*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**b) Would the Project 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 Impact:** There is no reasonably foreseeable condition or incident involving the Project that could result in release of hazardous materials into the environment, other than any potential inadvertent releases of typical gasoline and/or diesel fuels, solvents, or chemicals during typical construction- and operation-related activities of the Tulare County Office of Education/Administration Office and Conference Center (TCOE/AOCC). In the event of an accidental hazardous release or the Project encounters hazardous materials, existing regulations for handling hazardous materials require coordination with the California Department of Toxic Substances Control for an appropriate plan of action (which can include studies or testing to determine the nature and extent of contamination), as well as proper handling and disposal of those materials. Therefore, based on the information and analysis provided herein, the impact would be *less than significant*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

- c) 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?**

**No Impact:** The Project is located approximately 1.7 miles southeast from an existing school (Cottonwood Creek Elementary School). The Project does not involve the use or storage of hazardous substances other than insignificant amounts of pesticides, fertilizers, and cleaning agents required for normal maintenance of structures and landscaping. The Project would not emit hazardous emissions or involve the handling of acutely hazardous materials or waste. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

- d) Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

**No Impact:** The Department of Toxic Substances Control search did not result in any part of the Project site being listed as a hazardous materials site pursuant to Government Code Section 65962.5 Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

- 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 result in a safety hazard or excessive noise for people residing or working in the Project area?**

**Less Than Significant Impact:** The proposed Project is located approximately 4.9 miles southeast of the nearest public airport (Visalia Municipal Airport) and 3.75 miles southeast of the nearest private helipad (Kaweah Delta Helipad). According to the Tulare County Airport Comprehensive Airport Land Use Plan (CALUP) prepared in 2012, the Project site lies completely outside the Airport Influence Area, and therefore, outside of any Safety Zone (see map VIS-2 Visalia Municipal Airport Safety Zones accessed at: <https://tularecounty.ca.gov/rma/rma-documents/planning-documents/tulare-county->

[comprehensive-airport-land-use-plan/](#). As such, the development does not propose anything that will be a hazard to aviation safety as defined in the CALUP. The Project site will not be affected by any outstanding noise generated from airport activities as noise contours developed from 2019 that the airport would produce less than 65 dB for all nearby sensitive noise receptors, making the noise generated less than significant. There are no noise contours given for the Kaweah Delta Helipad; however, despite this private helipad being located approximately 1.1 miles closer to the Project site than Visalia Municipal Airport, neither would impact the Project site. As such, development of the proposed Project would not result in a safety hazard for people residing or working in the Project area. There is *a less than significant impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**f) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**No Impact:** The City's design and environmental review procedures would ensure compliance with emergency response and evacuation plans. In addition, the site plan will be reviewed by the Fire Department per standard City procedures to ensure consistency with emergency response and evacuation needs. Therefore, based on the information and analysis provided herein, the proposed Project would have *no impact* on emergency evacuation.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**g) Would the Project expose people or structures, either directly or indirectly, to significant risk of loss, injury or death involving wildland fires?**

**No Impact:** The land surrounding the Project site is developed to urban and agricultural uses which are not considered as wildlands. The proposed Project would not expose people or structures to significant risk of loss, injury or death involving wildland fires. Therefore, based on the information and analysis provided herein, there *would be no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required.*

**Cumulative Impacts: Less than significant**

The cumulative area is the Visalia General Plan planning area; including the unincorporated Tulare County area to be subsequently annexed into the City. The Proposed Project area reflects a reasonable extension of urban development to accommodate the administrative educational needs within the City and County. The Project would be developed using typical/standard practices in regard to construction-related activities. Based on the nature of the Project, it would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; it would not 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; it would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; it would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; it would not be located within two miles of any airport nor result in a safety hazard or excessive noise; and; it would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, based on the information and analysis provided herein, the Project would result in a *less than significant cumulative impact.*

## X. HYDROLOGY AND WATER QUALITY

<b>Would the Project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise sustainably degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would:				
(i) result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones risk the release of pollutants due to Project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater movement plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Environmental Setting***Surface Water*

Visalia is in the center of the Kaweah River Delta System, resulting in many rivers and creeks flowing through the City. The Saint Johns River is the City's primary surface water feature. Other significant surface water features include Modoc Ditch, Mill Creek Ditch, Mill Creek, Tulare

Irrigation District (TID) Canal, Packwood Creek, Cameron Creek, Deep Creek, Evans Creek, Persian Ditch, and several other local ditches. These receive water during the rainy season and help convey (drain) storm-related water from areas that are exposed to rainwater flows.

### *Groundwater*

Groundwater in Tulare County is present in valley deposits of alluvium that are several thousand feet thick and occur in both confined and unconfined conditions. The creeks in Visalia are tied to the groundwater system. The creeks lose water in the winter while they feed the groundwater and gain water in the summer when the groundwater feeds the creeks. The depth to groundwater varies significantly throughout the valley floor area of Tulare County. In the area around Visalia, depth to groundwater varies from about 120 feet below ground surface along the western portion of the city to approximately 100 feet below ground surface to the east, as measured in spring 2010. Groundwater levels measured in the city have declined since the 1940s, from approximately 30 feet below ground surface in 1940 to 120 feet below ground surface in 2010. Water quality of the groundwater that underlies the Planning Area is excellent for domestic and agricultural uses. This is likely due to the snowmelt that originates in the Sierra Nevada. Groundwater is the sole source of drinking water for the planning area residents.

The City of Visalia, in collaboration with the City of Tulare and the Tulare Irrigation District, formed the Mid-Kaweah Groundwater Sustainability Agency (MKGSA). The MKGSA completed a Groundwater Sustainability Plan to address the State's designation of the Kaweah Subbasin as being critically overdraft.

### *Stormwater Drainage*

The City, in conjunction with Kaweah Delta Water Conservation District and Tulare Irrigation District, operates and maintains a vast municipal storm drainage system that consists of drainage channels, 23 detention and retention basins, 33 pump stations and 250 miles of pipe. The City of Visalia has made improvements to their stormwater infrastructure to capture and recharge stormwater to the groundwater basin. Stormwater from the Project site will be collected and conveyed to either an offsite stormwater retention basin and/or will be distributed to the existing stormwater system throughout the City.

### *Flooding*

The City of Visalia is susceptible to flooding as the City is relatively flat and at a low elevation. In dry years, when surface conveyance of water for irrigation is reduced, farmers in the area extract water from the subsurface aquifers by pumping out groundwater to irrigate their crops. This action results in gradual subsidence (i.e., sinkage) of the land and increases the chance of flooding as the land sinks subjecting it to greater exposure of flood water during significant rain events. Of the total General Plan planning area in Visalia, 25 percent of it lies in areas that

are at high-risk to flood within the 100-year floodplain and another 60 percent lies within moderate-risk areas in the 500-year floodplain. The majority of the areas of the City at a high risk of flooding are in the northern sectors of Visalia.

## **Regulatory Setting**

### **Federal**

#### *Clean Water Act*

The Clean Water Act (CWA) is enforced by the U.S. EPA and was developed in 1972 to regulate discharges of pollutants into the waters of the United States. The Act made it unlawful to discharge any pollutant from a point source into navigable waters unless a National Pollution Discharge Elimination System (NPDES) Permit is obtained.

#### *National Flood Insurance Act*

The Federal Emergency Management Agency (FEMA) is tasked with responding to, planning for, recovering from, and mitigating against disasters. The Federal Insurance and Mitigation Administration within FEMA is responsible for administering the National Flood Insurance Program (NFIP) and administering programs that aid with mitigating future damages from natural hazards.

### **State**

#### *California Water Quality Porter-Cologne Act*

California's primary statute leading water quality and water pollution concerns with respect to both surface waters and groundwater is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the State Water Resource Control Board (SWRCB) and each of the nine Regional Water Quality Boards (RWQCB) power to protect water quality and further develop the Clean Water Act within California. The applicable RWQCB for the proposed Project is the Central Valley RWQCB.

#### *Central Valley RWQCB*

The proposed Project site is within the jurisdiction of the Central Valley Regional Water Quality Control Board (RWQCB). The Central Valley RWQCB requires a National Pollution Discharge Elimination System (NPDES) Permit and Stormwater Pollution Prevention Plan (SWPPP) for Projects disturbing more than one acre of total land area. Because the Project is greater than one acre, a NPDES Permit and SWPPP will be required.

### *Sustainable Groundwater Management Act*

The Sustainable Groundwater Management Act (SGMA) gives local agencies jurisdiction to manage groundwater supplies in the long-term. It encourages local governments to collaborate to achieve sustainable use of groundwater resources. The act ensures that all groundwater basins that are deemed high or medium risk of being overdraft establish a Groundwater Management Plan to maintain state of equilibrium of water being pumped in and out. In Visalia, the Mid-Kaweah Groundwater Sustainability Agency has jurisdiction and created their own Groundwater Sustainability Plan.

### *City of Visalia General Plan*

The 2030 General Plan includes the policies related to hydrology and water quality that correlate to the proposed Project:

- *PSCU-P-59*: Require new developments to incorporate floodwater detention basins into Project designs where consistent with the Stormwater Master Plan and the Groundwater Recharge Plan.
- *PSCU-P-60*: Control urban and stormwater runoff and point and non-point discharge of pollutants. As part of the City's Stormwater Management Program, adopt and implement a Stormwater Management Ordinance to minimize stormwater runoff rates and volumes, control water pollution, and maximize groundwater recharge. New development will be required to include Low Impact Development features that reduce impermeable surface areas and increase infiltration. Such features may include, but are not limited to:
  - Canopy trees or shrubs to absorb rainwater;
  - Grading that lengthens flow paths over permeable surfaces and increases runoff travel time to reduce the peak hour flow rate;
  - Partially removing curbs and gutters from parking areas where appropriate to allow stormwater sheet flow into vegetated areas;
  - Use of permeable paving in parking lots and other areas characterized by significant impervious surfaces;
  - On-site stormwater detention, use of bioswales and bioretention basins to facilitate infiltration; and
  - Integrated or subsurface water retention facilities to capture rainwater for use in landscape irrigation and other non-potable uses.
- *PSCU-P-46*: Adopt and implement a Water Efficient Landscaping Ordinance for new and/or refurbished development that exceeds mandated sizes, and ensure that all new City parks, streetscapes, and landscaped areas conform to the Ordinance's requirements. The Ordinance should include provisions to optimize outdoor water use by:
  - Promoting appropriate use of plants and landscaping;

- Establishing limitations on use of turf including size of turf areas and use of cool-season turf such as Fescue grasses, with exceptions for specified uses (e.g., recreation playing fields, golf courses, and parks);
- Establishing water budgets and penalties for exceeding them;
- Requiring automatic irrigation systems and schedules, including controllers that incorporate weather-based or other self-adjusting technology;
- Promoting the use of recycled water; and
- Minimizing overspray and runoff.

### **Discussion**

#### **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 Impact:** The Project will result in less than significant impacts to water quality due to potentially polluted runoff generated during construction-related activities. Construction may include excavation, grading, and other earthmoving activities across most of the 28-acre Project site. During storm events, exposed construction areas within the Project site result in runoff that could transport pollutants, such as chemicals, oils, sediment, and debris outside of the Project site. As is typical during construction-related activities, implementation of a Central Valley Regional Water Quality Control Board Stormwater Pollution Prevention Plan (SWPPP) will be required for the Project. A SWPPP identifies all potential sources of pollution that could affect stormwater discharges from the Project site and identifies best management practices (BMPs) related to stormwater runoff. As such, based on the information and analysis provided herein, the Project would result in a *less than significant impact*.

#### **Mitigation Measures: None required.**

Based on the information and analysis provided herein, no mitigation measures would be required.

#### **b) Would the Project substantially decrease groundwater supplies or interfere with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?**

**Less than Significant Impact:** Water services will be provided by the Cal Water, Visalia District, upon development. Cal Water currently produces about 27 million gallons of local groundwater per day from 59 active wells and delivers it to customers through more than 600 miles of pipeline. Cal Water delivers water to residential, commercial, industrial, and governmental customers. Residential customers account for most of the Cal Water service connections and 69 percent of its water uses. Non-residential water uses account for 28 percent of total demand, while distribution system losses account for the other 3 percent.

In 2020, Cal Water's system produced 30,152 acre-feet (AF) of groundwater (California Water Service, 2021). Cal Water's system has a capacity to pump 100,829 acre-feet per year (afy), all from groundwater, and is anticipated to extend water service to the Project site.

The Project would result in development of the site which would convert approximately 28 acres of surface area to predominantly impervious surfaces (e.g., buildings and parking areas). However, this would not significantly interfere with groundwater recharge as all captured stormwater would be diverted to a nearby stormwater basin for eventual groundwater recharge through percolation (and also through evaporation). As such, the addition of impervious surfaces would not substantially interfere with groundwater recharge and the Project would not increase the amount of groundwater usage beyond water used to irrigate the former walnut orchard that was removed from the Project area. Therefore, based on the information and analysis provided herein, the impact would be *less than significant*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**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, which would:**

**i) Result in substantial erosion or siltation on- or off-site?**

**Less than Significant Impact:** The proposed Project would result in the addition of impervious surfaces and alter existing drainage patterns on the 28-acre Project site which could, (without proper erosion controls) result in erosion or siltation on- or off-site. The disturbance of soils during construction-related activities could cause soil erosion, resulting in short-term, temporary, and intermittent construction-related impacts. However, this impact would be appropriately avoided through implementation of a Stormwater Pollution Prevention Plan (SWPPP) which include mandated erosion control measures that are designed to prevent significant impacts related to erosion caused by runoff during construction. The Project proponent will also be required to prepare drainage plans and a Development Maintenance Manual as required by the City of Visalia to ensure that existing drainage patterns are maintained during Project operations and that the Project would not result in substantial erosion or siltation on- or off-site. Therefore, based on the information and analysis contained herein, the impact would be *less than significant*.

**ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?**

**Less than Significant Impact:** The proposed Project would result in the addition of some impervious surfaces on the 28-acre Project site which could have the potential to increase surface runoff resulting in localized flooding on- or off-site. This impact would be appropriately avoided or minimized through submittal of drainage plans to the City Engineer prior to the issuance of grading permits and subsequent implementation of the approved plans/permits. The drainage plans would include BMPs to ensure runoff from the Project will not result in localized flooding on- or off-site. Therefore, based on the information and analysis contained herein, impact would be *less than significant*.

**iii. 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?**

**Less than Significant Impact:** The proposed Project would result in the addition of some impervious surfaces and alter existing drainage patterns on the 28-acre Project site which could have the potential to impact existing stormwater drainage systems or provide additional sources of polluted runoff. The proposed Project would contain a storm drainage basin to collect all runoff from the site. The disturbance of soils during construction-related activities could cause erosion. However, this impact would be appropriately avoided/minimized through implementation of a Stormwater Pollution Prevention Plan (SWPPP) which include mandated erosion control measures that are designed to prevent significant impacts related to erosion caused by runoff during construction-related activities. During Project operations, the proposed impervious surfaces, including roads, building pads, and parking areas, would collect automobile derived pollutants such as oils, greases, rubber, and heavy metals. These materials could contribute to point source and non-point source pollution if these pollutants were transported into waterways during storm events. Similar to Item X. c) ii., the Project proponent will be required to prepare drainage plans and a Development Maintenance Manual to prevent the Project from exceeding the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, based on the information and analysis provided herein, the impact would be *less than significant*.

**iv. Impede or redirect flood flows?**

**Less than Significant Impact:** The Project site is generally flat and would not require grading or leveling that could physically impede or redirect flood flows. The proposed Project site is located south of Persian ditch; however, the Project would not impact the irrigation ditch nor alter its course. According to National Flood Hazard mapping by the Federal Emergency Management Agency (FEMA), the proposed Project is in Flood Zone X, an area of minimal flooding (see Federal Emergency Management Agency. Flood Map Service Center. FEMAs National Flood Hazard Layer Viewer. Tulare County Unincorporated Area. 065066. 06107CO945E 6/16/2009 at: [Tulare County Office of Education](https://hazards-</a></p>
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[fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-119.3177924089551,36.26329261068947,-119.27620744038825,36.28059217405032](https://fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-119.3177924089551,36.26329261068947,-119.27620744038825,36.28059217405032)

The proposed Project would result in the addition of some impervious surfaces on the Project site which could affect drainage and flood patterns. Similar to Item X. c) ii., the Project proponent would be required to submit drainage plans to the City Engineer prior to the issuance of grading permits. The drainage plans will include BMPs to ensure the Project would not impede or redirect flood flows. Therefore, based on the information and analysis provided herein, the impacts would be *less than significant*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**d) Would the Project, in flood hazard, tsunami, or seiche zones, risk the release of pollutants due to Project inundation?**

**No Impact:** The proposed Project is located inland and not near an ocean or large body of water, therefore, it would not be affected by a flood hazard, tsunami, or seiche. Also, the proposed Project is in a relatively flat area and would not be impacted by inundation related to mudflow. Since the Project is in an area that is not susceptible to inundation from flood hazard, tsunami, or seiche, the Project would not risk release of pollutants due to Project inundation. As such, based on the information and the analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**e) Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**No Impact:** The Project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. The proposed Project is consistent with the Central Valley RWQCB and the Mid-Kaweah Groundwater Sustainability and corresponding Groundwater Sustainability Plan. The Project will comply with all applicable rules and regulations regarding water quality and groundwater management. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required.*

**Mitigation Measures: None Required.**

Based on the information and analysis provided herein, *mitigation measures would not be required.*

**Cumulative Impact: Less than Significant**

The cumulative area is the Visalia General Plan planning area; including the unincorporated Tulare County area to be annexed into the City as part of this Project. The Proposed project area reflects a reasonable extension of urban development to accommodate educational administrative needs within the City and County. The Project would be developed using typical/standard residential subdivision practices in regard to construction-related activities. As noted earlier, there are numerous water streams (i.e., creeks, ditches, and canals) in the Visalia Planning Area and some are in proximity to the Project. However, none of these streams are located within the Project area and the nearest stream is the Cameron Creek (approximately 600 feet north of the Project site). Overall, the change from a predominantly agricultural land use to the TCOE/AOCC would result in an overall reduction of groundwater extracted from the local aquifer when compared to water usage of the former walnut orchard (which use approximately 3.3 to 3.5 acre-feet per acre annually; see University of California Agricultural and Natural Resources Cooperative Extension. UC Davis Department of Agriculture and Resource Economics 2023. "SAMPLE Costs to Establish and Produce English Walnuts In the Southern San Joaquin Valley. Flood Irrigated. Page 4). The Project proponent would be required to implement preventative and minimization requirements (e.g., a SWPPP and BMPs) and receive City approvals for stormwater drainage facilities. As such, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality; it would not 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. The Project would not be exposed to flood hazard, nor would it be susceptible to tsunami, or seiche zones, because of its geographical location, therefore it would not risk the release of pollutants due to Project inundation. As noted earlier, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan as it would use less groundwater (Cal Water's water supply source) per year than the former walnut orchard. Therefore, based on the information and analysis provided herein, the Project would result in a *less than significant cumulative impact.*

XI. LAND USE AND PLANNING

<b>Would the Project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Environmental Setting**

The proposed Project site is not currently within the Visalia Planning Area and is outside of the City limits. The site is currently zoned for Agricultural use (AE-20) by the County of Tulare. However, as noted earlier, the Project site is directly adjacent to the existing Tulare County Office of Education Administration Center that is located within Visalia’s city limit. The Project site is currently vacant and is a reasonable expansion area for the TCOE/AOCC. As such, the site is ripe for annexation as a component of the overall Project. In addition to the TCOE/AOCC expansion, the Project would require administrative changes such as City of Visalia Pre-Zone Application; Tulare County Local Agency Formation Commission (LAFCO) – Reorganization (Annexation) Application; City of Visalia City Limits Boundary Change/Annexation; General Plan Amendment; Lot Line Adjustment; and Conditional Use Permit. As the Project site does not currently have Visalia a General Plan designation it would be pre-zoned as Quasi-Public and upon completion of the annexation process would be designated as Public/Institutional.

As noted earlier, the proposed expansion site is vacant land (formerly an agricultural use). Surrounding land uses include walnut orchards to the east, the existing TCOE Administration and Conference facilities to the west, single-family residential (mobile home park) and scattered rural residences to the north, mixed commercial uses to the southwest, and an institutional use (a church with accessory uses) to the south.

**Regulatory Setting**

**Federal**

None that apply to the Project.

**State**

None that apply to the Project.

## **Regional/Local**

### *The Tulare County Local Agency Formation Commission (LAFCO)*

"The Tulare County LAFCO is responsible for coordinating logical and timely changes in local governmental boundaries, conducting special studies which review ways to reorganize, simplify, and streamline governmental structure and preparing Spheres of Influence for each city and special district within each county. The Commission's efforts are directed to seeing that services are provided efficiently and economically while agricultural and open-space lands are protected." (see: <https://lafco.tularecounty.ca.gov/>).

### *Visalia General Plan*

The proposed Project site, upon annexation, would be designated as Public/Institutional.

The Project would be consistent with 2030 General Plan *LU-P-19*:

- *LU-P-19*: Ensure that growth occurs in a compact and concentric fashion by implementing the General Plan's phased growth strategy.

### City of Visalia Zoning Ordinance

Quasi-Public (QP) zone. The purpose and intent of the quasi-public zone is to provide a zone that is intended to allow for the location of institutional, academic, community service, governmental, and nonprofit uses. (Ord. 2017-01 (part), 2017: Ord. 9717 § 2 (part), 1997: prior code § 7630) (see Visalia Municipal Code. Title 17. Chapter 17.52 at: [https://codelibrary.amlegal.com/codes/visalia/latest/visalia\\_ca/0-0-0-36280#JD\\_Chapter17.52](https://codelibrary.amlegal.com/codes/visalia/latest/visalia_ca/0-0-0-36280#JD_Chapter17.52))

### Discussion

#### **a) Would the Project physically divide an established community?**

**No Impact:** The Project is located at the City's southern edge. As previously noted, the proposed Project site would be located on vacant land formerly used as an agriculture use (walnut orchard). Surrounding land uses include walnut orchards to the east, the existing TCOE Administration and Conference facilities to the west, single-family residential (mobile home park) and rural residences to the north, mixed commercial uses to the southwest, and an institutional use (a church with accessory uses) to the south. The Project location is similar to an infill project wherein unproductive, vacant agricultural land would be converted to an urban-type use. As such, the proposed Project will not physically divide an established community. The site is currently zoned for agricultural use by Tulare County

and is ideally located in an area ripe for annexation and subsequent development as a quasi-public use (in this instance, expansion of the TCOE/AOCC). Therefore, its location represents a reasonable extension of urban development thereby allowing the continuity and extension of planned TCOE/AOCC uses without creating a physical division of an established community. Typically, prior to annexation a “pre-zone” classification is assigned to the area to be annexed; in this case the proposed designation would be Quasi-Public. Following annexation, the proposed Project site would be designated as a Public/Institutional use in the Visalia General Plan and zoned as Quasi-Public. As such, the Project would be consistent with both the land use designation and zoning classification. Therefore, based on the information and analysis provided herein, the Project would result in *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

**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?**

**No Impact:** Though the Project site is located on land zoned by Tulare County for agricultural use (AE-20), it is directly adjacent to the existing TCOE Administrative Office which is designated as Mixed Use Commercial (C-MU) by the City of Visalia’s General Plan (Figure 3-7). As noted in Item a), prior to annexation a “pre-zone” classification would be assigned to the area to be annexed; in this case the proposed designation would be Quasi-Public. Following annexation, the proposed Project site would be designated as Public/Institutional use in the Visalia General Plan and zoned as Quasi-Public. As such, the proposed Project would not conflict with a land use, or any other policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As noted earlier, the Project is ideally located in an area ripe for annexation and subsequent development and is a reasonable expansion of the existing TCOE Administrative Office. Also noted earlier, in addition to annexation, other administrative processes include a City of Visalia Pre-Zone Application; Tulare County Local Agency Formation Commission (LAFCO) – Reorganization (Annexation) Application; City of Visalia City Limits Boundary Change/Annexation; General Plan Amendment; Lot Line Adjustment; and Conditional Use Permit. As such, following annexation the Project would be consistent with and would not conflict with land use planning, policies and regulations. Therefore, based on the information and analysis contained herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*

**Cumulative Impact: Less than Significant**

The geographic context for the cumulative land use and planning effects occurs from potential future development under the proposed Project combined with impacts from the projected growth in the rest of Tulare County and the surrounding region. The land use analysis determined that the proposed Project would not divide an established community or conflict with established plans, policies, and regulations, in or outside the City of Visalia, adopted for the purpose of avoiding or mitigating an environmental effect. The Project would not create substantial land use impacts. Development is likely to continue to occur in surrounding cities and in the Tulare County region as well. However, such development is taking place in already urbanized areas as essentially an infill development of a former agricultural use on vacant land and would not require any land use changes that would create land use conflicts, nor would it divide communities. Growth from new development, and particularly this Project, would be consistent with and would not conflict with existing land use planning, policies and regulations following completion of the annexation process. Therefore, based on the information and analysis contained herein, the proposed Project would not result in a cumulatively considerable contribution to cumulative impacts related to land use changes and would result in a *less than significant impact*.

## XII. MINERAL RESOURCES

<b>Would the Project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally - important mineral resource recovery site delineated on a local general plan, specific plan, or other lands use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Environmental Setting**

Tulare County contains mineral resources of sand, gravel, and crushed stone, found in alluvial deposits and hard rock quarries. Most of this mining takes place along rivers and at the base of the Sierra foothills. Although the Visalia Planning Area currently contains three former sand and gravel mines, there are no currently operating mines and no designated Mineral Resource Zones within the City or within the Project site.

**Regulatory Setting****Federal**

None that apply to the Project.

**State***California State Surface Mining and Reclamation Act*

The California State Surface Mining and Reclamation Act was adopted in 1975 to regulate surface mining to prevent adverse environmental impacts and to preserve the state's mineral resources. The Act is enforced by the California Department of Conservation's Division of Mine Reclamation. However, as no mining or subsequent reclamation would occur as a result of this Project, this Act does not apply.

**Discussion**

**a) 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?**

**No Impact:** The Project site has no known mineral resources that would be of value to the region and the residents of the State, therefore the proposed Project would not result in the loss of or impede the mining of regionally or locally important mineral resources. Therefore, based on the information and analysis contained herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

**b) Would the Project result in the loss of availability of a locally - important mineral resource recovery site delineated on a local general plan, specific plan, or other lands use plan?**

**No Impact:** There are no known mineral resources of importance to the region and the Project site is not designated under the City's or County's General Plan as an important mineral resource recovery site. As such, the proposed Project would not result in the loss of availability of known regionally or locally important mineral resources. Therefore, based on the information and analysis contained herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*

**Cumulative Impact: No impact.**

As noted earlier, the City of Visalia Planning Area does not contain any important mineral resources or mining operations. As the City does not contain any known mineral resources, the General Plan does not include any Goals or policies applicable to mineral resources. Therefore, based on the information and analysis provided herein, the Project would not result in the loss or impede the mining of regionally or locally important mineral resources. There would be *no cumulative impact*.

## XIII NOISE

<b>Would the Project result in:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive ground-borne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a Project located within the vicinity of a private airstrip or, an airport land use plan or, where such a plan has not been adopted, within two miles of public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Environmental Setting**

Noise is often described as unwanted sound. Sound is the variation in air pressure that the human ear can detect. If the pressure variations occur at least 20 times per second, they can be detected by the human ear. The number of pressure variations per second is called the frequency of sound, and is expressed as cycles per second, called Hertz (Hz). Ambient noise is the “background” noise of an environment. Ambient noise levels on the proposed Project site are primarily due to agricultural activities and traffic. Construction activities usually result in an increase in sound above ambient noise levels. Vibration is seismic waves that radiate along the surface of the earth and downward into the earth. The operation of heavy construction equipment, particularly pile driving and other impacts devices such as pavement breakers create this vibration.

**Sensitive Receptors**

Noise level allowances for various types of land uses reflect the varying noise sensitivities associated with those uses. Residences, hotels/motels, hospitals, schools, and libraries are some of the most sensitive land uses to noise intrusion. These uses have more stringent noise level allowances than most commercial or agricultural uses that are not subject to impacts

such as sleep disturbance. The nearest sensitive receptor is the mobile home park north of the Project site.

**Regulatory Setting**

**Federal**

None that apply to the Project.

**State**

None that apply to the Project.

**Regional/Local**

*City of Visalia Noise Ordinance*

The City of Visalia Noise Ordinance provides noise level standards for land use compatibility. Exterior and interior noise levels may not exceed any of the categorical noise level standards shown in Table 3-12. The standards are shown in A-weighted decibels (dBA). For Single Family Residential, the exterior noise during the daytime is to be below 70 dBA, and the indoor noise during the daytime is to be below 55 dBA.

**Table 3-12 City of Visalia Noise Standards**

Category	Cumulative number of minutes in any one hour time period	Evening and daytime (6:00 a.m. to 7:00 p.m.)	Nighttime (7:00 p.m. to 6:00 a.m.)
<b>Exterior Levels</b>			
1	30	50	45
2	15	55	50
3	5	60	55
4	1	65	60
5	0	70	65
<b>Interior Levels</b>			
1	5	45	35
2	1	50	40
3	0	55	45

**Source:** City of Visalia Noise Ordinance

*City of Visalia General Plan*

The current noise element of the City’s General Plan establishes goals and policies intended to limit community exposure to excessive noise levels. Visalia’s current General Plan identifies noise sources such as roadways, rails, and airports within the city and includes land use compatibility guidelines.

*N-P-4* Where new development of industrial, commercial or other noise generating land uses (including roadways, railroads, and airports) may result in noise levels that exceed the

noise level exposure criteria established by Tables 8-2 and 8-3 [in the Visalia General Plan], require a noise study to determine impacts, and require developers to mitigate these impacts in conformance with Tables 8-2 and 8-3 [in the Visalia General Plan] as a condition of permit approval through appropriate means.

*N-P-5* Continue to enforce applicable State Noise Insulation Standards (California Administrative Code, Title 24) and Uniform Building Code (UBC) noise requirements.

Also included in Policy N-P-5 are possible noise mitigation measures and alternative acoustical design that reduce noise levels as follows.

*“Noise mitigation measures may include but are not limited to:*

- Screen and control noise sources, such as parking and loading facilities, outdoor activities, and mechanical equipment;*
- Increase setbacks for noise sources from adjacent dwellings;*
- Retain fences, walls, and landscaping that serve as noise buffers;*
- Use soundproofing materials and double-glazed windows;*
- Use open space, building orientation and design, landscaping and running water to mask sounds; and*
- Control hours of operation, including deliveries and trash pickup, to minimize noise impacts.*

*Alternative acoustical designs that achieve the prescribed noise level reduction may be approved, provided a qualified Acoustical Consultant submits information demonstrating that the alternative designs will achieve and maintain the specific targets for outdoor activity areas and interior spaces. As a last resort, developers may propose to construct noise walls along state highways and arterials when compatible with aesthetic concerns and neighborhood character. This would be a developer responsibility, with no City funding.”* (see Visalia General Plan. Chapter 8: Safety and Noise. Policy N-P-4, page 8-28 at: [https://www.visalia.city/depts/engineering\\_n\\_building\\_planning\\_n\\_community\\_preservation/planning/gp.asp](https://www.visalia.city/depts/engineering_n_building_planning_n_community_preservation/planning/gp.asp)).

#### *City of Visalia Noise Ordinance*

“Chapter 8.36 of the City’s Municipal Code contains the City’s noise ordinance, which establishes exterior and interior noise level standards. Standards are measured in terms of the cumulative number of minutes in any one-hour time period during which a noise level may be exceeded. Lower noise levels (measured in dBA) may be exceeded for longer periods. Separate thresholds are established for daytime (6 a.m. to 7 p.m.) and nighttime (7 p.m. to 6 a.m.) hours.

Under the current Ordinance, interior noise levels should not exceed 70 dBA during evening and daytime and 65 dBA during the nighttime, for any period of time. Exterior noise levels should not exceed 55 dBA and 45 dBA, respectively”. (see Visalia General Plan. Chapter 8. page 8-26

at:

[https://www.visalia.city/depts/engineering\\_n\\_building\\_planning\\_n\\_community\\_preservation/planning/gp.asp](https://www.visalia.city/depts/engineering_n_building_planning_n_community_preservation/planning/gp.asp)).

## **Discussion**

### **a) Would the Project result in generation of a substantial temporary or permeant increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

**Less than Significant Impact:** The nature of the Project, development of expanded administrative and conferencing uses, does not lend itself to noise generation that would exceed the City of Visalia’s noise thresholds. The Project would not include the operation and/or use of noise generating sources that would exceed Visalia noise thresholds (for example, fabricating, manufacturing, or sporting events). However, the Project would result in short-term, temporary, and intermittent noise sources during construction-related activities and typical office noise when operational. The average noise levels generated by construction equipment that will likely be used in the proposed Project are provided in Table 3-12; while Figure 3-3 shows construction related exterior noise levels based on distance from construction equipment.

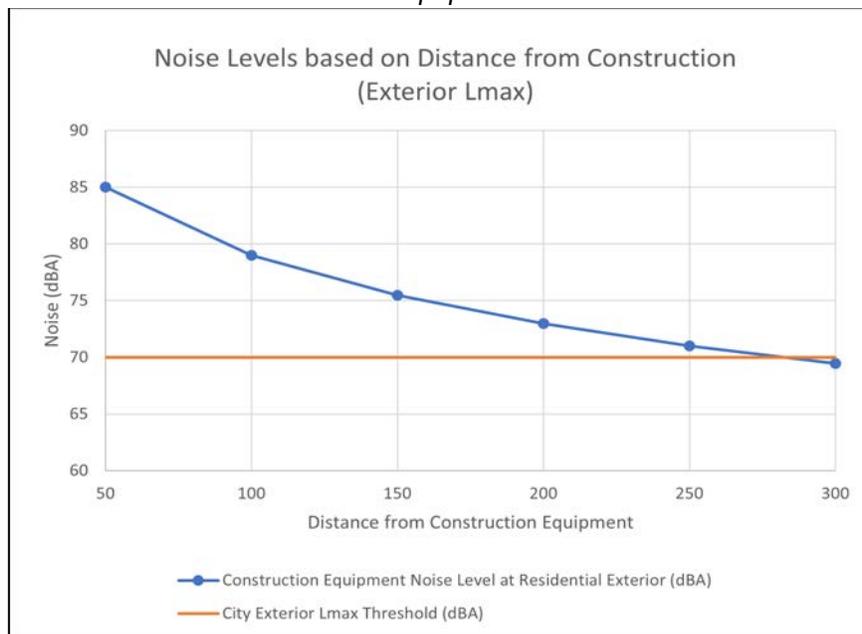
The nearest residences and sensitive receptors are the residences (mobile home park) to the north, the church to the south, and a rural single-family home adjacent to the southernmost boundary of the Project (located just north of Avenue 264/Liberty Road). With the Project adjacent to an existing residential community, noise disturbance is unavoidable. However, construction-related noise generating activities would be required to comply with Visalia Municipal Code Chapter 8.36 to ensure that the construction noise impacts would be less than significant. Measures such as maintaining minimum setback distances between construction equipment and receptors, only conducting construction-related activities during weekday daytime hours, and noise barriers would be implemented to avoid significant construction-related noise impacts.

Long-term noise levels resulting from the Project would be produced by the daily operation (Monday-Friday) of the TCOE/AOCC which are not normally associated with high operational noise levels. Because noise generated during Project construction-related activities would be short-term, temporary, and intermittent, it is anticipated that noise levels would not exceed the thresholds established by the Visalia Noise Ordinance for sensitive receptors. Due to the nature of the Project, no component of the Project would generate high noise levels typically associated with more intense uses such as commercial- and/or industrial-uses. As such, based on the information and analysis provided herein, the impact would be *less than significant*.

<b>Table 3-12. Noise Levels of Noise-generating Construction Equipment at Various Distances</b>	
<b>Type of Equipment</b>	<b>Exterior Lmax at 50 feet (dBA)</b>
Tractors	84
Loaders	80
Backhoes	80
Excavators	85
Generator Sets	82
Air Compressors	80
Rubber Tired Dozers	85
Forklifts	75
Welders	73
Graders	85
Scrapers	85
Cranes	85
Paving Equipment	85
Rollers	85

*Source: FHA Construction Noise Handbook (dBA at 50 feet).  
Noise levels beyond 50 feet were estimated using the inverse square law based on given values for dBA at 50 feet.*

Figure 3-3. Construction Related Noise Levels Based on Distance from Construction Equipment. Exterior Noise.



**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required.*

**b) Would the Project result in generation of excessive ground-borne vibration or groundborne noise levels?**

**Less than Significant Impact:** Although Project operations would not include uses or activities that typically generate excessive groundborne vibration or groundborne noise levels, Project construction-related activities could introduce short-term, temporary, and intermittent groundborne vibration from the Project site and toward the surrounding area. Sources that may produce perceptible vibrations are provided in Table 3-14.

<b>Table 3-14. Vibration Levels Generated by Construction Equipment.</b>		
<b>Equipment</b>	<b>Peak Particle Velocity (inches/second) at 25 feet</b>	<b>Approximate Vibration Level (LV) at 25 feet</b>
Pile driver (impact)	1.518 (upper range) 0.644 (typical)	112 104
Pile driver (sonic)	0.734 upper range 0.170 typical	105 93
Clam shovel drop (slurry wall)	0.202	94
Hydromill (slurry wall)	0.008 in soil 0.017 in rock	66 75
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58
<b>Source:</b> <i>Transit Noise and Vibration Impact Assessment, Federal Transit Administration, September 2018.</i>		

The primary source of vibration during Project construction would likely be from bulldozers (and other land shaping equipment such as earthmovers), which would generate 0.089 inch per second PPV at 25 feet with an approximate vibration level of 87 VdB. Vibration from a bulldozer (or other earthmoving equipment) would be short-term, temporary, and intermittent and would not be a source of continual vibration. There are no adopted City standards or thresholds of significance for vibration. The evaluation of potential impacts related to construction vibration levels is based on the published data in the 2018 FTA Guidelines. At 25 feet, the buildings most susceptible to vibration could be impacted at .12

inch/second. Therefore, based on the information and analysis contained herein, the impact would be *less than significant*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

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

**No Impact:** The proposed Project is located approximately 4.9 miles southeast of Visalia Municipal Airport. Additionally, the Project site is located approximately 3.75 miles southeast of the Kaweah Delta Helipad (at the Kaweah Health Medical Center). According to the Tulare County Airport Comprehensive Airport Land Use Plan (CALUP), the Project site lies completely outside of the Airport Influence Area. As such, the Project site will not be affected by any noise generated from airport-related activities. Noise contours developed from 2019 show that the airport would produce less than 65 dB for all nearby sensitive noise receptors, making the noise generated less than significant. There are no noise contours given for the Kaweah Delta Helipad, but because this private helipad is situated farther from the site than the Visalia Municipal Airport, and the noise generated from that airport is less than significant, the noise generated from Kaweah Delta is also less than significant. The entirety of proposed Project located outside of the 65 dB contours produced from any public airport or airstrip, as such airport-related noise would not impact the Project area. Therefore, based on the information and analysis contained herein, there would be *a less than significant impact*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*

**Cumulative Impact: No impact.**

The City of Visalia Planning Area is the cumulative impact area. As noted earlier, Project construction-related activities could introduce short-term, temporary, and intermittent noise and groundborne vibration from the Project site and toward the surrounding area. The earlier analysis of the proposed project addresses cumulative impacts with regard to noise, groundborne noise, and vibration. Although multiple simultaneous nearby noise

sources may, in combination, result in higher overall noise levels, this effect is captured and accounted for by the ambient noise level metrics that form the basis of the thresholds of significance for noise analysis. Any measurement of sound or ambient noise, whether for the purpose of evaluating land use compatibility, establishing compliance with exterior and interior noise standards, or determining point-source violations of a noise ordinance, necessarily will incorporate noise from all other nearby perceptible sources. Additionally, although noise attenuation is influenced by a variety of topographical, meteorological, and other factors, noise levels decrease rapidly with distance, and vibration impacts decrease even more rapidly. Also noted earlier, the City's Municipal Code noise ordinance which establishes exterior and interior noise level standards. Standards are measured in terms of the cumulative number of minutes in any one-hour time period during which a noise level may be exceeded. Lower noise levels (measured in dBA) may be exceeded for longer periods. Separate thresholds are established for daytime (6 a.m. to 7 p.m.) and nighttime (7 p.m. to 6 a.m.) hours. Also, under the current Ordinance, interior noise levels should not exceed 70 dBA during evening and daytime and 65 dBA during the nighttime, for any period of time. Exterior noise levels should not exceed 55 dBA and 45 dBA. Therefore, site-level cumulative noise or vibration impacts across City boundaries could occur only infrequently. However, the ongoing implementation of these policies and regulations that would require compliance from the Project would serve to prevent or minimize site-based cumulative noise impacts. Therefore, based on the information and analysis provided herein, there would be a less than significant cumulative impact.

## XIV. POPULATION AND HOUSING

<b>Would the Project:</b>	Potentially Significant Impact	Less than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Environmental Setting**

The adjusted 2020 United States Census Bureau estimated the population in the City of Visalia to be 145,251 as of July 2024 (see: <https://www.census.gov/quickfacts/fact/table/visaliacitycalifornia/PST045223>). This is an increase from the population estimate of the 141,590 in 2020 and the 124,442 population estimate of the 2010 census. Factors that influence population growth in Visalia include job availability, housing availability, and the capacity of proposed and existing infrastructure. The Visalia General Plan projects the buildout population to be 210,000 in 2030. However, the nature of the Project (i.e., expansion of the existing TCOE to include additional administrative offices and a conference center), does not include any housing-related component. Rather the Project would accommodate administrative, educational, training, and conferencing needs which subsequently benefits the area's student population that accompanies population growth in general.

**Regulatory Setting****Federal**

None that apply to the Project.

**State**

None that apply to the Project.

**Regional/Local**

The ability to accommodate the City of Visalia's population growth and size is regulated by the development code and Housing Element of the General Plan. These documents dictate the number of dwelling units per acre allowed on various land uses and establish minimum and maximum lot sizes, which in turn regulates the number of housing units, and subsequently has a direct influence and impact on the City's population growth and size. As the Project would not result in either population growth or housing, the City's housing related plans/policies would not apply to this Project.

### **Discussion**

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

**No Impact:** The United States Census Bureau estimates the population in the City of Visalia to be 145,251 as of July 2024. No component of the Project would impact population or housing. As noted earlier, the nature of the Project would be expansion of the existing TCOE facility to include additional administrative, training, and conferencing components. As such, the Project would not induce unplanned growth which would impact population or housing. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

**b) Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

**No Impact:** The Project would not displace any existing housing. There are no existing homes to be removed from the Project site as it is currently vacant land that was previously used for agricultural (walnut orchard). The Project would not increase or decrease the amount of available housing, specifically within Visalia, and generally throughout the County. As noted earlier, the nature of the Project would be expansion of the existing TCOE facility to include additional administrative, training, and conferencing components. Therefore, based on the information and analysis provided herein, there would be *no Impact*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*

**Cumulative Impact: No impact.**

The City of Visalia Planning Area is the cumulative impact area. As described in impact discussions Item a) and Item b), the nature of the Project would be expansion of the existing TCOE facility to include additional administrative, training, and conferencing components. Implementation of the Project would not induce a substantial amount of unplanned population growth or growth for which inadequate planning has occurred, or displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, based on the information and analysis provided herein, the Project would not result in a cumulatively considerable impact to population and housing, and there would be *no cumulative impact*.

## XV. PUBLIC SERVICES

<b>Would the Project:</b>	Potentially Significant Impact	Less than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable serve ratios, response times of other performance objectives for any of the public services:				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Environmental Setting***Fire*

The Project site is currently in an unincorporated area of Tulare County which is in the jurisdiction of the Tulare County Fire Department. Once annexed, the Project site will be served by the Visalia Fire Department (VFD), which operates 6 fire stations within the City of Visalia. The VFD can currently provide fire protection services to the proposed Project site prior to Project implementation. VFD Fire Station #52 (located at 2224 W. Monte Vista Avenue) is the nearest fire station to the site, approximately 2.10 miles to the northwest.

*Police*

Law enforcement services are provided to the Project site via The Visalia Police Department (VPD). The VPD will continue to provide police protection services to the proposed Project site following Project implementation. The VPD headquarters are located approximately 3.8 miles north of the proposed Project site. VPD Substation District 2 is located approximately 1.5 miles north of the Project site.

*Schools*

The nearest existing school is Cottonwood Creek Elementary School located approximately 1.39 miles northwest from the Project site. The proposed Project site would be primarily used as administrative/conference center; however, a three-classroom kitchen training component is also included as part of the Project. Overall, the Project would be under the jurisdiction of Tulare County Office of Education.

## **Regulatory Setting**

### **Federal**

None that apply to the Project.

### **State**

#### *California Fire Code*

The California Fire Code (Title 24, Part 9 of the California Code of Regulations) establishes regulations to safeguard against hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout the State of California. The Fire Code includes regulations regarding fire-resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire services features such as fire apparatus access roads, means of egress, fire safety during construction and demolition, and wildland-urban interface areas.

### **Regional/Local**

#### *City of Visalia Fire Department Plan Check and Hydrant Ordinance*

Visalia's requirements for new construction include provisions for the Fire Department to review building and site plans prior to the issuance of any permit. The Fire Department ensures that proposed Projects will be adequately served by water, and accessible to emergency vehicles. The Department also enforces the City's Hydrant Ordinance, which states that developers are responsible for the installation of water mains and hydrants and determines the minimum spacing for fire hydrants. Street dimensions are scrutinized to ensure that space will be preserved for ladder trucks to be stabilized, and for emergency vehicles to turn around.

#### *City of Visalia General Plan*

The 2030 General Plan includes the following policy related to public services that correlates to the proposed Project:

*PSCU-P-38*: Continue to encourage school multi-purpose facilities and open space for community uses to maximize their utilization.

## Discussion

**a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable serve ratios, response times of other performance objectives for any of the public services:**

### a. Fire protection?

**Less than Significant Impact:** The VFD can currently provide fire protection services to the proposed development. The closest fire station is Station #52, located approximately 2.10 miles north of the Project site (at 2224 W. Monte Vista Avenue). The Fire Department uses the National Fire Protection Association (NFPA) standard for fire protection services, which requires 1 responder per 1,000 residents. The City currently has 0.48 responders per 1,000 residents. By 2030, the City expects growth up to a total of 210,000 residents. This would result in 0.32 responders per 1,000 residents. This will require an additional 85 on-duty responders by 2030 to meet 1 responder per 1,000 residents, or 41 new responders to meet the current ratio. The existing fire stations are located to provide optimum service; however, new stations will be needed to support the expanding city. Therefore, based on the information and analysis provided herein, the impact would be *less than significant*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

### b. Police protection?

**Less than Significant Impact:** The VPD will provide services to the proposed development. The VPD headquarters are located approximately 3.8 miles northeast of the proposed Project site. VPD Substation District 2 is located approximately 1.5 miles north of the Project site. The VPD does not establish service standards either in terms of officers per thousand residents or in incident response time but plans to maintain the current ratio of 1.7 officers per 1,000 residents. The Department has 143 sworn officers working out of two districts, as well as seven reserve sworn officers, 64 civilian officers, and 65 volunteers. The timing of when new police service facilities would be required or details about size and location cannot be known until such facilities are planned and proposed, and any attempt to analyze impacts to a potential future facility would be speculative. As new or expanded police service facilities become necessary, construction or expansion Projects would be

subject to their own separate CEQA review in order to identify and mitigate any potential environmental impacts. Therefore, based on the information and analysis provided herein, the impact would be *less than significant*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

**c. Schools?**

**No Impact:** As noted earlier, the nature of the Project (i.e., expansion of the existing TCOE to include additional administrative offices, conference center, three classroom training kitchen, and warehouse), does not include any housing-related component that is typically associated with an increase of school-aged children which could subsequently result in the need for additional schools. Rather the Project would accommodate administrative, educational, training, and conferencing needs which subsequently benefits the area's student population that accompanies population growth in general. Therefore, based on the information and analysis provided herein, the impact would be *less than significant*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

**d. Parks?**

**Less than Significant Impact:** Mooney Grove Park is the nearest existing park and is approximately 0.22 of a mile from the proposed Project site. As noted earlier, the nature of the Project (i.e., expansion of the existing TCOE to include additional administrative offices, conference center, three classroom training kitchen, and warehouse) does not include any population-inducing component which could increase the need for parks. Rather the Project would accommodate administrative, conferencing, educational training, and warehousing needs. As such, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

**e. Other public facilities?**

**Less than Significant Impact:** The proposed Project may be required to pay a development impact fee for Public Facilities, including for the Civic Center, Corporation Yard, and Libraries. Additional development fees will be paid to offset the increased demand for

public services related to transportation, water, wastewater, groundwater recharge, storm drainage, and general governmental services. Fees for transportation, water, wastewater, and general government are based on building square footage and will be calculated prior to the issuance of building permits. Fees for groundwater recharge and storm drainage are based on site acreage.

While the payment of development fees could result in the construction of new or altered public service facilities, no specific Projects have been identified at this time. As new or expanded public service facilities become necessary, construction or expansion Projects would be subject to their own separate CEQA review in order to identify and mitigate any potential environmental impacts. Therefore, based on the information and analysis contained herein, the impact would be *less than significant*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*

**Cumulative Impact: No impact.**

The City of Visalia Planning Area is the cumulative impact area. Regarding schools, parks, or other public facilities, as noted earlier, the nature of the Project would not result in a population increase that could subsequently result in a change to or demand for new (or expanded) facilities of schools, parks or other public facilities. There would be no cumulative to these resources.

In summary, the Visalia General Plan EIR accounted for growth from development during the General Plan's planning horizon that included estimated growth in the service areas of each service provider of fire or police protection services in the service area of the Visalia's Fire and Police Departments; respectively, VFD and VPD. The proposed Project would be subject includes goals, policies, and actions, listed in impact discussion Item a.i.) and a.ii.) for assessing staffing levels, facility, and equipment needs of police and fire services as the city grows.

As described earlier, both the VFD and VPD have identified the need for additional fire stations, VFD and VPD personnel, equipment, etc., to adequately serve future growth in the Visalia Planning Area. As the VFD and VPD will require new equipment or staffing through the planning horizon, the funds for such improvements could be provided through a combination of required payment of developer impact fees and the annual budget process (that is, through the General Fund).

In and of itself, the Project would result in a less than significant. However, future development within the Visalia planning area would be required to undergo its own project-specific review at the time of project application to assess impacts to fire and police protection services. With adequate planning in place in the City service area, the Project would not result in a cumulatively considerable impact to fire and police protection services. Therefore, based on the information and analysis provided herein, *cumulative impacts would be less than significant.*

## XVI. RECREATION

<b>Would the Project:</b>	Potentially Significant Impact	Less than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Environmental Setting**

There are 40 parks totaling 678 acres within the Visalia Planning Area. The City of Visalia provides diverse types of parks and open space facilities, or park types, to meet park and open space recreation needs of the community. Park types include:

- **Pocket Parks:** A park typically between one-half and two acres in size intended to serve the needs of a specific neighborhood within a half-mile radius. There are currently 12 pocket parks in Visalia totaling 12 acres.
- **Neighborhood Parks:** A park typically 2 to 5 acres in size that provides basic recreation activities for one or more neighborhoods. There are currently 23 neighborhood parks in Visalia totaling 120 acres.
- **Community Parks:** A park typically ranging from 5 to 12 acres in size or larger, which are intended to serve the recreational needs of a larger area of the city. There are currently 4 community parks in Visalia totaling 43 acres.
- **Large City Parks:** A park generally larger than 40 acres in size intended to serve the recreational needs of all city residents and to create opportunities for contact with the natural environment. These parks may include a concentration of sports fields, golf courses, and areas for picnicking and passive enjoyment of open space. There are currently 2 large city parks in Visalia totaling 261 acres.
- **Natural Corridors and Greenways:** A network of greenways of varying size intended to serve the recreational needs of city residents. These parks may include facilities such as bikeways, walkways, and riding trails, and are primarily developed along the city's waterways. There is a total of 196 acres of natural corridors and greenways.

The Visalia Planning Area additionally contains two county parks and a public golf course. The golf course is not counted to the total amount of parkland. The Visalia General Plan states a total parkland standard of five (5) acres of city parkland per 1,000 residents.

## **Regulatory Setting**

### **Federal**

None that apply to the Project.

### **State**

#### *Quimby Act*

The 1975 Quimby Act (California Government Code section 66477) authorized cities and counties to pass ordinances requiring that developers set aside land, donate conservation easements, or pay fees for park improvements. The Act states that the dedication requirement of parkland can be a minimum of three acres per thousand residents or more and up to five acres per thousand residents if the existing ratio is greater than the minimum standard. Revenues generated through in-lieu fees collected and the Quimby Act cannot be used for the operation and maintenance of park facilities. In 1982, the Act was substantially amended. The amendments further defined acceptable uses of or restrictions on Quimby funds, provided acreage/population standards and formulas for determining the exaction, and indicated that the exactions must be closely tied (nexus) to a Project's impacts as identified through studies required by the California Environmental Quality Act (CEQA).

### **Regional/Local**

#### *City of Visalia General Plan*

The 2030 General Plan includes policies related to parks and recreation. However, as the proposed Project would not induce population growth, which subsequently could lead to the need for additional parks, these policies do not apply to the proposed Project.

Discussion

#### **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:** As noted earlier, the nature of the Project (i.e., expansion of the existing TCOE to include additional administrative offices and a conference center), does not include any

population inducing component which could increase the need for recreational facilities including parks. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

**b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

**Impact:** As noted earlier, the nature of the Project (i.e., expansion of the existing TCOE to include additional administrative offices, conference center, a three classroom training kitchen, and warehouse), and does not include any population inducing component. Typically, an increase in population could result in an increase the need for recreational facilities. As such, the absence of population growth would not induce the need for or require the construction, expansion, or additional recreational facilities. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*.

**Mitigation Measures: None required.**

Based on the information and analysis contained herein, *no mitigation would be required*

**Cumulative Impact: No impact.**

The City of Visalia Planning Area is the is the cumulative impact area. Future growth in the area would result in increased demand for park and recreational facilities throughout the City and region. State law allows jurisdictions to require additional development to fund park improvements. However, as previously noted, the nature of the Project (i.e., expansion of the existing TCOE to include additional administrative offices, conference center, a three classroom training kitchen, and warehouse), and does not include any population inducing component. Typically, an increase in population could result in an increase need for recreational facilities. As such, the Project would not result in substantial or accelerate physical deterioration of a park or recreation facility, nor would it include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, based on the information and analysis provided herein, the Project would not result in a cumulatively considerable impact

to park and recreational facilities and there would be *no cumulative impacts* associated with the Project.

## XVII. TRANSPORTATION

<b>Would the Project:</b>	Potentially Significant Impact	Less than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with the CEQA guidelines Section 15064.3, Subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

In addition to references of the Visalia General Plan and its accompanying EIR, the analysis in this section is supplemented by a Traffic Impact Analysis (TIA) prepared by qualified consultants 4Creeks, Inc., which can be found in Appendix D.

**Environmental Setting***Vehicular Access/Egress*

Vehicular access to the Project would be available via two access/egress points; the existing Mooney Boulevard/SR 63 on the west and a new point along Avenue 264/Liberty Road at the south side of the Project. Other than travel lanes to access structures and parking areas, the Project would not include any other new access/egress point.

*Parking*

The Project proponent will provide new 388 parking stalls, including 17 accessible spaces, which is consistent with Chapter 17.34 Off Parking and Loading Facilities of the Visalia Municipal Code. During construction-related activities, workers will utilize temporary construction staging areas within the Project site and would not utilize any on-street parking during the construction-related activities for parking vehicles and equipment.

**Regulatory Setting**

**Federal**

None that apply to the Project.

**State**

*CEQA Guidelines Section 15064.3, Subdivision (b): Criteria for Analyzing Transportation Impacts*

- (1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, Projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the Project area compared to existing conditions should be considered to have a less than significant transportation impact.
- (2) Transportation Projects. Transportation Projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity Projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, a lead agency may tier from that analysis as provided in Section 15152.
- (3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular Project being considered, a lead agency may analyze the Project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many Projects, a qualitative analysis of construction traffic may be appropriate.
- (4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a Project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a Project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the Project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

**Regional/Local**

*City of Visalia Standard Specifications*

The City of Visalia Standard Specifications are developed and enforced by the City of Visalia Public Works Department to guide the development and maintenance of streets within the City.

The cross-section drawings contained in the City's Standard Specifications dictate the development of roads within the City.

### *City of Visalia General Plan*

The 2030 General Plan includes the policies related to transportation that correlate to the proposed Project:

- *T-P-3:* Design and build future roadways that complement and enhance the existing network, as shown on the General Plan Circulation Diagram, to ensure that each new and existing roadway continues to function as intended.
- *T-P-5:* Take advantage of opportunities to consolidate driveways, access points, and curb cuts along existing arterials when a change in development or a change in intensity occurs or when traffic operation or safety warrants.
- *T-P-23:* Require that all new developments provide right-of-way, which may be dedicated or purchased, and improvements (including necessary grading, installation of curbs, gutters, sidewalks, parkway/landscape strips, bike, and parking lanes) other city street design standards. Design standards will be updated following General Plan adoption.
- *T-P-24:* Require that proposed developments make necessary off-site improvements if the location and traffic generation of a proposed development will result in congestion on major streets or failure to meet LOS D during peak periods or if it creates safety hazards.
- *T-P-26:* Require that future commercial developments or modifications to existing developments be designed with limited points of automobile ingress and egress, including shared access, onto major streets.

### *City of Visalia VMT Thresholds and Implementation Guidelines*

The City of Visalia's *VMT Thresholds and Implementation Guidelines* document, prepared by qualified consultants LSA for Visalia, provides guidance for determining a Project's transportation impacts based on vehicle miles traveled (VMT). The Guidelines acknowledge that certain activities and Projects may result in a reduction in VMT and GHG emissions. The guidelines are as follows:

*"Residential, office, or mixed-use Projects that are consistent with the City's General Plan and located within green-colored VMT zones, as shown in Figures 6, 7, and 8, respectively, are presumed to have similar low VMT profiles and could be screened out from further VMT analysis."*

As noted in Appendix I of the TIA, "The City of Visalia's VMT Thresholds and Implementation Guidelines provides a list of land use development projects that would qualify for screen out of VMT analysis because they are expected to cause less than significant impacts." (TIA, Appendix I). Following annexation, the Project would be consistent with the City's General Plan. The City's

VMT Guidelines allow automatic screen out if projects generate less than 1,000 average daily trips (ADT). As noted in the VMT Analysis, Appendix I of the TIA, "This Project is estimated to generate 1,465 ADT. However, the Guidelines go on to say that proposed office projects that are consistent with the City's General Plan that are also located within green-colored VMT zones, as shown in the figures in the Guidelines, are presumed to have similar low VMT profiles and could be screened out from further VMT analysis.

The City of Visalia's average VMT/employee is 7.0, as compared to the VMT/employee of 8.8 in Tulare County. Projects in a green zone are likely to meet the City's acceptability threshold of 16% below the average VMT/employee of the County (8.8 VMT/employee). If a proposed office project exceeds a level of 84% of the existing County average VMT/employee, the project would indicate a significant VMT impact.

The Project is located within TAZ #1453 and has an average VMT/employee of 7.16 per the City of Visalia VMT Screening Application. See Figure 1 [in the Appendix I of the TIA] for the approximate Project location. The Project's average trip distance of 7.16 is 18.6% below the County's average trip distance in miles traveled, so the screen out criteria of at least 16% below the regional average is met." (TIA, Appendix I).

## **Discussion**

### **a) Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

**Less than Significant Impact:** The Project would ultimately result in the construction of approximately 149,200 square feet of expanded/additional Tulare County Office of Education administrative, training kitchen, and warehousing uses (108,000 square feet of office and conference room space, three classrooms with a training kitchen totaling 6,200 square feet, and approximately 35,000 square feet of warehouse space The City's General Plan has planned for the development of mixed commercial uses in this area (i.e., Mooney Boulevard/SR 63 corridor). As such, upon annexation into the City, the Project would reflect a reasonable approach to urban development without infringing upon predominantly non-urbanized areas. Any roadway improvements along Avenue 264/Liberty Road would be required to comply with City standards/specifications. All interior Project travel lanes will also be required to comply with City standards/specifications. As summarized in the TIA,

"Intersection Level of Service

The analysis presented in this report has identified that all four of the intersections analyzed remain or will perform within the City's adopted level of service standard (LOS D or better).

Roadway Segment Analysis

The roadway segment analysis completed for S. Mooney Boulevard (between Avenue 264 and Avenue 268) and Avenue 264 (Liberty Road) (between Mooney Boulevard and Oakmore Way) found that they are both currently performing within the City's acceptable level of service standard (LOS D or better). Both segments remain within the cities acceptable level of service standards throughout all the scenarios reviewed.

#### Queuing Analysis

The turn lanes lengths for each study intersection during each study scenario are sufficient." (TIA, PAGE 50).

Therefore, based on the TIA prepared by qualified consultants 4Creeks, and the information and analysis provided herein, there would be a *less than significant impact*.

#### **Mitigation Measures: None required.**

Based on the TIA prepared by qualified consultants 4Creeks, and the information and analysis provided herein, no mitigation would be required.

#### **b) Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)?**

**No Impact:** The City of Visalia's *VMT Thresholds and Implementation Guidelines* (Guidelines) document, prepared by qualified consultants LSA (and adopted the City of Visalia on March 15, 2021), provides guidance for determining a Project's transportation impacts based on vehicle miles traveled (VMT). A variety of Projects may be screened out of a complicated VMT analysis due to the presumption described in the Technical Advisory (of the Guidelines) regarding the occurrence of less than significant impacts.

The Guidelines state: "*Residential, office, or mixed-use Projects that are consistent with the City's General Plan and located within green-colored VMT zones, as shown in Figures 6, 7, and 8, respectively, are presumed to have similar low VMT profiles and could be screened out from further VMT analysis.*"

The State of California Governor's Office of Planning and Research (OPR) document entitled Technical Advisory on Evaluating Transportation Impacts in CEQA dated December 2018 (OPR Guidelines) provides the reasoning for the screen out. The OPR Guidelines state: "*Residential and office Projects that are in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT. Maps created with VMT data, for example from a travel survey or a travel demand model, can illustrate areas that are currently below threshold VMT. Because new development in such locations would likely result in a similar level of VMT, such maps may be used to screen out residential and office Projects from needing to prepare a detailed VMT analysis.*"

The TIA (see Appendix D) prepared by qualified consultants 4Creeks, LLC., analyzed the Project using the City of Visalia’s VMT Guidelines and concluded the following: “A vehicle miles traveled (VMT) analysis was conducted to determine whether the Project would create a VMT impact. The analysis was based on information provided by the City of Visalia’s VMT guidance in the *Procedures for Traffic Impact Analysis (TIA)*, dated March 2021 [subsequently updated February 3, 2025] and the *VMT Thresholds and Implementation Guidelines*, dated March 2021. The Project was screened out from requiring a VMT analysis due to the Project location within a low VMT area. The Project was determined to have a less than significant VMT analysis and no mitigation measures were required. Additional information on the VMT screening analysis is shown in Appendix J [of the TIA].” (TIA, page 49.)

Therefore, the Project can be screened out and will not require additional VMT analysis. As such, based on the conclusion contained in the TIA prepared by qualified consultants 4Creeks, and the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the conclusion contained in the TIA prepared by qualified consultants 4Creeks, and the information and analysis provided herein, no mitigation measures would be required.

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

**Less than Significant Impact:** The Project does not include any incompatible uses or include any design features that could increase traffic hazards. The Project provides vehicle new vehicular access/egress points through future improvement along Avenue 264/Liberty Road on the south. The Project could also be accessed/egressed from an existing point along Mooney Boulevard/SR 63 on the west side of the Project. These improvements will be subject to review by the City’s engineer to ensure the new access points comply with City standards and specifications. As such, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Therefore, based on the including the TIA prepared by qualified consultants 4Creeks, and the information and analysis provided herein, the Project would resulting in a *less than significant impact*.

**Mitigation Measures: None required.**

Based on the conclusion contained in the TIA prepared by qualified consultants 4Creeks, and the information and analysis provided herein, *no mitigation measures* would be required.

**d) Would the Project result in inadequate emergency access?**

**No Impact:** This Project would not result in inadequate emergency access. Emergency access to the site would be available an existing access/egress point along Mooney Boulevard/SR 63 and a new access/egress point Avenue 264/Liberty Road on the south. Also, the network of internal travel lanes within the proposed Project site provides full access to all structures within the existing and proposed expansion of the TCOE/AOCC. Therefore, based on the information and analysis provided herein, the Project would have *no impact* on emergency access.

**Mitigation Measures: None Required.**

**Cumulative Impact: Less than Significant**

The cumulative impact area is the Visalia Planning Area. The Project in and of itself would result in a less than significant impact. However, future potential development under the Visalia General Plan would contribute to an increase in VMT in the Visalia Planning Study Area. The balance of Items in this resource would result in no to less than significant impacts. Implementation of the General Plan would result in a net increase of people and employees (service population) in the Visalia Planning Area. To reiterate, the Project in and of itself would result in a less than significant impact. Therefore, based on the TIA prepared by qualified consultants 4Creeks, and the information and analysis provided herein, the Project itself would result in *a less than significant impact*.

**Mitigation Measures: None Required.**

XVIII. TRIBAL CULTURAL RESOURCES

<b>Would the Project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
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:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) 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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) 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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In addition to references of the Visalia General Plan and its accompanying EIR, the analysis in this section is supplemented by the “Phase 1 Cultural Resources Assessment for the Tulare County Office of Education Administration and Conference Center Expansion Project, City of Visalia, Tulare County, California Project” (CRA) prepared by qualified consultants Taylored Archaeology in October 2025. The full report can be found in Appendix C.

**Environmental Setting**

*Natural Environment*

The Project area lies in the Central Valley of California, which is approximately 450 miles from north to south, and ranges in width east to west from 40 to 60 miles (Prothero 2017). The Central

Valley is divided into two subunits, the Sacramento Valley in the north and the San Joaquin Valley in the south, which are each named after the primary rivers within each valley (Madden 2020). The Project is located approximately 305 feet above sea level on the open flat plains of the Southern San Joaquin Valley. Climate within the San Joaquin valley is classified as a 'hot Mediterranean climate', with hot and dry summers, and cool damp winters characterized by periods of dense fog known as 'tule fog' (Prothero 2017).

The Kaweah, Tule, Kern, and Kings rivers flowed into large inland lakes with no outflow except in high flood events, in which the lakes would flow through the Fresno Slough into the San Joaquin River. The largest of these inland lakes was Tulare Lake, which occupied a vast area of Tulare and Kings Counties and was the largest freshwater lake west of the Mississippi. These four rivers in the Tulare Lake Drainage Basin accounted for more than 95 percent of water discharged into Tulare Lake, with the remaining five percent sourced from small drainages originating in the Coast Ranges to the west.

The Project is in central western Tulare County on the valley floor of the San Joaquin Valley within the greater Kaweah River Delta alluvial fan. Specifically, the Project is located 600 feet south of the Saint John's River, which is a tributary of the Kaweah River

### *Ethnography*

The Yokuts were generally divided into three major groups, the Northern Valley Yokuts, the Southern Valley Yokuts, and the Foothill Yokuts. The Yokuts are a sub-group of the Penutian language that covers much of coastal and central California and Oregon. The Yokuts language contained multiple dialects spoken throughout the region, though many of them were mutually understandable.

Each local tribe was a land-owning group that was organized around a central village and shared common territory and ancestry. Most local tribe populations ranged from 150 to 500 people. These local tribes were often led by a chief, who was often advised by a variety of assistants including the winatum, who served as a messenger and assistant chief. Early studies by Kroeber, Gifford and Schenck, and Gayton concluded that social and political authority within local tribes was derived from male lineage and patriarchy. However, more recent reexaminations argue that this assumption of patriarchal organization was based on male bias by early 20th century researchers, and instead Yokuts sociopolitical authority was matriarchal in nature and centered around matrilineal use-rights and women's work groups.

Prior to Euro-American contact, there was abundance of natural resources within the greater Tulare Lake area. Due to these resources, Yokuts maintained some of the largest populations in North America west of the continental divide.

### *Historic Setting*

The San Joaquin Valley did not experience contact with Europeans until the late 1700s. The earliest exploration of the San Joaquin Valley by Europeans was likely by the Spaniards when in the fall of 1772 a group known as the Catalonian Volunteers entered the valley through Tejon Pass in search of deserters from the Southern California Missions. However, the group only made it as far north as Buena Vista Lake in modern day Kern County before turning around due to the extensive swamps. Initial settlement within the valley by Europeans in the 1830s was largely either by trappers or horse thieves. With the end of the Mexican American War and the beginning of the gold rush in 1848, the San Joaquin Valley became more populated with ranchers and prospectors. By 1850, California became a state, and Tulare County was established in 1853. Visalia, founded in 1852, is one of the oldest cities in the Southern San Joaquin Valley. During the first few decades, Visalia was a supply center for nearby gold rushes, and had an agricultural economy based on livestock and some agriculture.

## **Methodology**

### *Records Search*

Taylor Archaeology requested a cultural resource records search from the SSJVIC of the CHRIS at California State University in Bakersfield, California on September 15, 2025. The purpose of this request was to identify and review prior cultural resource studies and previously recorded cultural resources on or near the Project boundary. The records search included prior cultural resources investigation reports conducted, previously recorded resources within the Project boundary (Appendix B [of the CRA]) and the 0.5- mile radius around the Project boundary. Also included in research were cultural resource records (DPR forms) as well as the Historic Properties Directory of the Office of Historic Preservation list, General Land Office Maps, Archaeological Determinations of Eligibility list, and the California Inventory of Historic Resources list.

As noted earlier (in Item IV Cultural Resources), according to the records search results in a letter dated September 30, 2025, three prior cultural resource studies were conducted within the Project area. Additionally, four previous cultural resources studies were conducted within a 0.5-mile radius of the Project boundary and none intersected the Project boundary.

### *Archival Research*

Archival research was conducted to investigate the historical background for any potential historic structures, buildings and historical deposits that may exist and land use within the Project boundary. Historical maps, historical aerial photographs, historical US Geological Survey (USGS) topographic maps, Google Earth aerial photographs, Google Street View photos, Map Aerial Locator Tool (MALT) at the Henry Madden Library, California State University, Fresno, books, articles and other records were used to better understand the prehistory and history of the Project area.

Based on the information provided in the CRA, there are no known existing historic structures, buildings and historical deposits that may exist and land use within the Project boundary.

#### *Native American Outreach*

As noted in the CRA, “Tailored Archaeology sent a request to the NAHC as part of this cultural resources investigation for a Sacred Lands File (SLF) search on September 15, 2025. The objective of the SLF search was to identify tribal cultural resources present in or near the Project boundary. Native American outreach and consultation with Tribes are not included in this scope of work. It is assumed that government-to-government consultation under Assembly Bill (AB) 52 will be conducted by the CEQA lead agency. The SLF results are in Chapter 4 [of the CRA, Appendix C of this MND].” (CRA, page 14).

In a response dated September 16, 2025, the NAHC stated that a search of the SLF was negative and did not indicate the presence of tribal cultural resources in the Project area. The NAHC supplied a list of Native American representatives to contact for information or knowledge of cultural resources in the Project site and the surrounding area (see Appendix C of the CRA, Appendix C in this MND).

The following Native American organizations/individuals were contacted from the list provided by NAHC below:

1. Chairperson Delia Dominguez of the Kitanemuk & Yowlumne Tejon Indians
2. Cultural Specialist I Nichole Escalon of the Santa Rosa Rancheria Tachi Yokut Tribe;
3. Cultural Specialist II Samantha McCarty of the Santa Rosa Rancheria Tachi Yokut Tribe;
4. Tribal Historic Preservation Officer Shana Powers of the Santa Rosa Rancheria Tachi Tribe;
5. Chairperson Michelle Heredia-Cordova of Table Mountain Rancheria
6. Cultural Resource Director Bob Pennell of Table Mountain Rancheria
7. Environmental Department Kerri Vera of the Tule River Tribe;
8. Tribal Historical Preservation Officer Felix Chrisman of the Tule River Indian Tribe; and
9. Chairperson Kenneth Woodrow of the Wuksache Indian Tribe/Eshom Valley Band.

In accordance with SB 18, City of Visalia staff sent each Native American representative listed by NAHC an outreach letter and a map notifying them of the Project and asking if they had any knowledge of the Project area or surrounding vicinity. In addition, a 90-day period was offered an opportunity to the representatives to consult and offer comments on the proposed project. The 90-day period was from October 14, 2025 to January 12, 2026. No comments were provided by the tribal representatives.

#### *Archaeological Pedestrian Survey*

As noted in the CRA, “On October 4, 2025, Archaeologist Consuelo Sauls conducted an archaeological pedestrian survey of the 28-acre Project site. The survey began in the southeast corner of the Project boundary, using transects spaced 5 meters apart oriented east to west. The archaeologist carefully inspected all exposed ground surface and rodent burrow back-dirt piles and other areas of bare earth for soil discoloration that could indicate the presence of artifacts (e.g., lithics and ceramic sherds), soil depressions, and features indicating the former presence of buildings or structures (e.g., postholes and foundations). The Project boundary was checked for both prehistoric deposits and historic-age features, structures, and artifacts more than 50 years old that may be present on the ground surface. A plan map of the Project site was used to see land usage, structures and map out transects. Field survey observations were documented in the field and survey coordinates were recorded on a Gaia Global Positioning System application. Photographs were taken of the Project site using an iPhone 11 Pro digital camera.” (CRA, pages 15-16).

### **Regulatory Setting**

In this report “cultural resources” are defined as prehistoric or historical archaeological sites as well as historical objects, buildings, or structures. In accordance with 30 Code of Federal Regulations (CFR) §60.4, “historical” in this report applies to cultural resources which are at least 50 years old. The significance or importance of a cultural resource is dependent upon whether the resource qualifies for inclusion at the local or state level in the California Register of Historical Resources (CRHR), or at the federal level in the National Register of Historic Places (NRHP). Cultural resources that are determined to be eligible for inclusion in the CRHR are called “historical resources” (California Code of Regulations [CCR] 15064.5[a]). Under this statute the determination of eligibility is partially based on the consideration of the criteria of significance as defined in 14 CCR 15064.5(a)(3). Cultural resources eligible for inclusion in the NRHP are deemed “historic properties.”

### **Federal**

#### *National Historic Preservation Act*

The National Historic Preservation Act was adopted in 1966 to preserve historic and archeological sites in the United States and is administered by the National Park Service. The Act created the National Register of Historic Places, the list of National Historic Landmarks, the Advisory Council on Historic Preservation (ACHP), and the State Historic Preservation offices. Section 106 of the NHPA requires federal agencies to consider the impacts of their actions on historic properties and provide an opportunity for the ACHP to comment on Projects prior to their implementation. This section also requires agencies to be publicly accountable for any potential consequences to their actions on historic properties. To be eligible for listing, a property must retain integrity of location, design, setting, materials, workmanship, feeling, and associations, and possess one of the following characteristics:

- Association with events that have made a significant contribution to the broad patterns of history (events).
- Association with the lives of persons significant in the past (persons).
- Distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possess high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction (architecture).
- Has yielded, or may be likely to yield, information important to prehistory or history (information potential).

## **State**

### *California Senate Bill (SB) 18*

The Local and Tribal Intergovernmental Consultation process, commonly known as SB 18, was signed into law September of 2004 and took effect March 1, 2005. SB 18 refers to PRC Sections 5097.9 and 5097.993, which define cultural places as:

- Native American sanctified cemetery place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9).
- Native American historic, cultural, or sacred site that is listed or may be eligible for listing in the California Register of Historic Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.993).

SB 18 established responsibilities for local governments to contact, provide notice to, refer plans to, and consult with California Native American tribes that have been identified by the NAHC and if that tribe requests consultation after local government outreach as stipulated in Government Code Section 65352.3. The purpose of this consultation process is to protect the identity of the cultural place and to develop appropriate and dignified treatment of the cultural place in any subsequent project. The consultation is required whenever a general plan, specific plan, or open space designation is proposed for adoption or to be amended. Once local governments have sent notification, tribes are responsible for requesting consultation. Pursuant to Government Code Section 65352.3(a)(2), each tribe has 90 days from the date on which they receive notification to respond and request consultation. In addition to the requirements stipulated previously, SB 18 amended Government Code Section 65560 to "allow the protection of cultural places in open space element of the general plan," and amended Civil Code Section 815.3 to add "California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places."

As noted earlier in Item IV. Cultural Resources, Tribal Consultation letters were provided to the following Native American organizations/individuals from the list provided by NAHC below:

1. Chairperson Delia Dominguez of the Kitanemuk & Yowlumne Tejon Indians;
2. Cultural Specialist I Nichole Escalon of the Santa Rosa Rancheria Tachi Yokut Tribe;
3. Cultural Specialist II Samantha McCarty of the Santa Rosa Rancheria Tachi Yokut Tribe;
4. Tribal Historic Preservation Officer Shana Powers of the Santa Rosa Rancheria Tachi Tribe;
5. Chairperson Michelle Heredia-Cordova of Table Mountain Rancheria;
6. Cultural Resource Director Bob Pennell of Table Mountain Rancheria;
7. Environmental Department Kerri Vera of the Tule River Tribe;
8. Chairperson Neil Peyron of the Tule River Indian Tribe; and
9. Chairperson Kenneth Woodrow of the Wuksache Indian Tribe/Eshom Valley Band.

### *California Assembly Bill (AB) 52*

The legislature added the requirements regarding tribal cultural resources through AB 52. By including an understanding if any tribal cultural resources could be present within an area early in the CEQA process, the legislature intended to ensure that local and tribal governments, public agencies, and project proponents would have information available to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process (AB 52 Section 1[b][7]).

Section 1 of the bill states the legislature's intent as follows (AB 52 Section 1[b]):

“...In recognition of their (California Native American Tribes) governmental status, establish a meaningful consultation process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning tribal cultural resources, at the earliest possible point in the CEQA environmental review process. To accomplish those goals, the legislature added or amended the following sections in the PRC: 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 5097.94.”

The City of Visalia established a Tribal Consultation communication process with all tribes noted in the list provided by the NAHC as part of SB 18 compliance. SB 18 establishes a 90-day review process, as opposed to the 30-day window established in AB 52.

### *California Register of Historical Resources*

In California, the term “historical resource” includes “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political,

military, or cultural annals of California” (California PRC § 5020.1[j])(State of California 2021). In 1992, the California legislature established the California Register of Historical Resources (CRHR) “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (California PRC § 5024.1(a)). The criteria for listing resources on the CRHR, enumerated in the following text, were developed to be in accordance with previously established criteria developed for listing in the NRHP. According to California PRC § 5024.1(c) (1– 4), a resource is considered historically significant if it (i) retains “substantial integrity,” and (ii) meets at least one of the following criteria:

- The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California).
- Associated with an individual or group having a profound influence on the history of California.
- A prototype of, or an outstanding example of, a period, style, architectural movement, or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer, or master builder.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the National Register of Historic Places (NRHP), and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

## **Regional/Local**

### *City of Visalia General Plan*

Under Chapter 3, the City’s Role and Tools for Preservation, in the General Plan of the City of Visalia defines a “cultural resources” as:

- Chapter 3.3: Sites, structures, or any other physical evidence associated with human activity considered important to be culturally important. This includes archaeological resources and contemporary Native American resources in addition to the historic resources that are the subject of this chapter. Impacts of development on cultural resources of all kinds must be avoided to the greatest extent possible, as described by policies in Chapter 6: Open Space and Conservation.

- Under Chapter 6: Open Space and Conservation, within the General Plan of the City of Visalia the following policies are outlined for the preservation of cultural resources:
- Chapter 6.5: OSC-P-39 Establish requirements to avoid potential impacts to sites suspected of being archeologically, paleontologically, or historically significant or of concern, by:
  - Requiring a records review for development proposed in areas that are considered archaeologically or paleontologically sensitive.
  - Determining the potential effects of development and construction on archaeological or paleontological resources (as required by CEQA).
  - Requiring pre-construction surveys and monitoring during any ground disturbance for all development in areas of historical and archaeological sensitivity.
  - Implementing appropriate measures to avoid the identified impacts, as conditions of Project approval.

In the event that previously unidentified historical, archaeological, or paleontological resources are discovered during construction, grading activity in the immediate area shall cease and materials and their surroundings shall not be altered or collected. A qualified archaeologist or paleontologist must make an immediate evaluation and avoidance measures, or appropriate mitigation should be completed, according to CEQA Guidelines. The State Office of Historic Preservation has issued recommendations for the preparation of Archaeological Resource Management Reports that will be used as guidelines.

### **Discussion**

**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:**

- i. 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**

**Less Than Significant Impact with Mitigation:** As noted earlier, a records search was conducted on behalf of the Applicant by qualified consultants Taylored Archaeology from the SSJVIC of the CHRIS at California State University, Bakersfield, California. As noted in Item V. Cultural Resources, the purpose of this request was to determine if historical or archaeological sites had previously been recorded within the study area, if the Project area had been systematically surveyed by archaeologists prior to the initial study, and/or whether the region of the field Project was known to contain archaeological sites and to thereby be archaeologically sensitive. In addition, archival

research and archaeological pedestrian survey was conducted to identify cultural resources.

According to the SSJVIC records search, there have been no previous cultural resource studies within the Project area, and four cultural resource studies within a 0.5-mile radius of the Project site. None of the cultural resources were recorded within the Project site boundary. Details of the records search are provided in Appendix C in this MND.

Taylored Archaeology requested a Sacred Lands File (SLF) search from the NAHC on September 15, 2025. The CRA noted, "In a response dated September 16, 2025, the NAHC stated that a search of the SLF was negative and did not indicate the presence of tribal cultural resources in the Project area. The NAHC provided a contact list of Native American tribes who may have knowledge of cultural resources in the Project area (Appendix C [of the CRA, Appendix C herein])".

As noted earlier, the following Native American organizations/individuals were contacted from the list provided by NAHC below:

1. Chairperson Delia Dominguez of the Kitanemuk & Yowlumne Tejon Indians;
2. Cultural Specialist I Nichole Escalon of the Santa Rosa Rancheria Tachi Yokut Tribe;
3. Cultural Specialist II Samantha McCarty of the Santa Rosa Rancheria Tachi Yokut Tribe;
4. Tribal Historic Preservation Officer Shana Powers of the Santa Rosa Rancheria Tachi Tribe;
5. Chairperson Michelle Heredia-Cordova of Table Mountain Rancheria;
6. Cultural Resource Director Bob Pennell of Table Mountain Rancheria;
7. Environmental Department Kerri Vera of the Tule River Tribe;
8. Chairperson Neil Peyron of the Tule River Indian Tribe; and
9. Chairperson Kenneth Woodrow of the Wuksache Indian Tribe/Eshom Valley Band.

The City of Visalia sent outreach letters all the Native American representatives on the contact list on October 14, 2025 (see Appendix C). The letters included a description of the proposed Project and a topographic map of the location. No responses were received regarding the Project area.

Although no significant Tribal Cultural resources were identified on the site, the presence of remains or unanticipated cultural resources under the ground surface is possible. As an abundance of caution, implementation of Mitigation Measures CUL-1 and CUL-2, as applicable, would ensure that impacts to this checklist item would be avoided or minimized. As such, based on the information and analysis provided herein, the Project would result in a *less than significant impact with mitigation*.

**Mitigation Measures: See CUL-1 and CUL-2**

Based on the information and analysis provided herein, implementation of Mitigation Measures CUL-1 and CUL-2 would result in a *less than significant impact*.

- ii. **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 Impact with Mitigation:** As noted earlier, qualified consultants Taylored Archaeology requested a Sacred Lands File (SLF) search from the NAHC on September 15, 2025. The SLF search was requested to identify whether there are sensitive or sacred tribal cultural resources in the vicinity of the Project boundary that could be affected by the proposed Project. The NAHC also included contact information of local Native American representatives who may have knowledge or interest in sharing information of resources of sacred significance present in or near the Project boundary. Each individual listed was sent a nongovernmental outreach letter and a map were sent via email notifying them of the Project and asking if they had any knowledge of the Project area or surrounding vicinity.

To date, the lead agency has not conclusively determined the existence of any known tribal cultural resources located within the Project area. Additionally, the SLF search did not identify the presence of tribal cultural resources in the proposed Project boundary. The City of Visalia sent outreach letters sent to all the Native American representatives on the contact list on October 14, 2025. The letters included a description of the proposed Project and a topographic map of the location. At the time of release of this MND, no responses were received regarding the Project area. Responses received by Native American individuals at the time of writing may be found in Appendix C of this document.

While past agricultural and development activities may have destroyed or obscured ground surface evidence of tribal cultural resources within the Project site, intact resources may potentially exist subsurface, (that is, below the ground surface). If resources were found to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American Tribe. Implementation of Mitigation Measures CUL-1 and CUL-2 will ensure that any impacts resulting from Project implementation would be *less than significant*.

**Mitigation Measures: See CUL-1 and CUL-2**

Based on the information and analysis provided herein, implementation of Mitigation Measures CUL-1 and CUL-2 would result in a *less than significant impact* with mitigation.

### **Mitigation Measures: CUL-1 and CUL-2**

The following Mitigation Measures were developed based on the recommendations provided by qualified consultants Taylored Archaeology as noted in the CRA, pages 34-35.

**Mitigation Measure CUL-1:** In the event that previously unidentified archaeological materials are encountered during development or ground-moving activities in the Project boundary, all work should be halted in the immediate vicinity (100 feet) until a qualified archaeologist can identify the discovery and assess its significance. If determined to be significant, the qualified historical and/or archaeologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines and the City's Historic Preservation Ordinance.

**Mitigation Measure CUL-2:** In the event that human remains are unearthed during construction-related activities (such as, earth shaping, excavating, grading, trenching, etc.), all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, 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. Also, pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner 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 landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

### **Cumulative Impact: Less than Significant with Mitigation**

The geographic area of this cumulative analysis is the Visalia General Plan planning area. As noted earlier, the Project site does not include any known historical, cultural, archaeological or tribal cultural resources. Also as noted earlier, this analysis relies on the information, determinations, technical studies, etc., contained in the adopted/certified Visalia General Plan EIR. CHRIS and NACH search results indicate that there are no known resources on the Project site. Requests for Tribal Consultation were provided to local Tribes;

however, no responses were received. As an abundance of caution, Mitigation Measures CUL-1 and CUL-2 are incorporated herein to minimize impacts in the unlikely event that any resources applicable to this Checklist Item are inadvertently discovered. Therefore, based on the information and analysis provided herein, and with implementation of Mitigation Measures CUL-1 and CUL-2 as applicable, cumulative impacts of the Project would be *less than significant with mitigation*.

## XIX. UTILITIES AND SERVICE SYSTEMS

<b>Would the Project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Environmental Setting***Wastewater*

Sewer services would be provided to the site by the City of Visalia. The City owns and operates a Water Reclamation Facility (WRF) to collect, treat, and dispose of wastewater. Following an upgrade to the WRF, the plant can treat and disinfect up to 22 million gallons of wastewater per day (mgd). The City of Visalia operates a sewer system divided into eight service areas. The system currently has over 468 miles of sewer pipe.

*Solid Waste*

The City of Visalia provides residential waste pickup but has contracts with companies for other disposal needs such as green waste and recycling. For example, Sunset Waste Systems

provides waste collection for commercial uses and processes recyclable material. Tulare County Compost and Biomass processes green waste.

The Tulare County Resource Management Agency manages solid waste disposal within all of Tulare County. Programs include household hazardous waste disposal, electronics recycling, tire recovery, yard waste recycling, metal recycling and appliance recovery programs. The County landfills approximately 300,000 tons of waste per year, which is equivalent to about five (5) pounds per person per day or approximately one (1) ton per County resident per year. The County operates three disposal sites: the Visalia Disposal Site (northwest of Visalia); the Woodville Disposal Site (southeast of the City of Tulare); and the Teapot Dome Disposal Site (southwest of Porterville; however, it is not open to the public). These sites have a combined remaining capacity of 24,258,052 cubic yards, with a total capacity of 37,101,523 cubic yards.

#### *Water*

The California Water Service Company (Cal Water) distributes groundwater supply. Cal Water's Visalia District supply wells extract groundwater from the Kaweah Groundwater Subbasin. The Cal Water system includes 75 operational groundwater wells, about one third of which have auxiliary power for backup. There are 600 miles of main pipeline in the system. The system includes two elevated 300,000-gallon storage tanks, an ion exchange treatment plant, four granular activated carbon filter plants and one nitrate blending facility. The system currently has the capacity to pump 100,829 acre-feet per year (afy), all from groundwater. This will be able to supply a growing population, as the average water demand between 2016 and 2020 was 28,408 afy. According to the City's Urban Water Management Plan (2021), the City is projected to have a water demand of 35,276 afy in 2030.

### **Regulatory Setting**

#### **Federal**

None that apply to the Project

#### **State**

##### *CalRecycle*

California Code of Regulations, Title 14, Natural Resources – Division 7 contains all current CalRecycle regulations regarding nonhazardous waste management in the state. These regulations include standards for the handling of solid waste, standards for the handling of compostable materials, design standards for disposal facilities, and disposal standards for specific types of waste.

##### *Central Valley RWQCB*

The Central Valley RWQCB requires a Stormwater Pollution Prevention Plan (SWPPP) for Projects disturbing more than one acre of total land area. Because the Project is greater than one acre, a SWPPP to manage stormwater generated during Project construction will be required. The Central Valley RWQCB regulates Wastewater Discharges to Land by establishing thresholds for discharged pollutants and implementing monitoring programs to evaluate program compliance. This program regulates approximately 1,500 dischargers in the region.

The Central Valley RWQCB is also responsible for implementing the federal program, the National Pollutant Discharge Elimination System (NPDES). The NPDES Program is the federal permitting program that regulates discharges of pollutants to surface waters of the U.S. Under this program, a NPDES permit is required to discharge pollutants into Waters of the U.S. There are 350 permitted facilities within the Central Valley Region.

*Cal Water Urban Water Management Plan (UWMP) – Visalia District*

The UWMP describes the Visalia District service area, system demand and usage, available water resources, reliability of the water supply, and contingency planning for water shortage. It also contains a conservation section in compliance with SB X7-7 describing water usage reduction targets and implementation measures. The UWMP identifies five core programs for water conservation in the District that involve promotion of high-efficiency fixtures in residential settings, promotion of high-efficiency irrigation systems, and public information and education.

**Regional/Local**

*City of Visalia General Plan*

The 2030 General Plan includes the objectives and policies related to utilities and service systems that correlate to the proposed Project:

- *PSCU-O-14*: Provide for long-range community water needs by adopting best management practices for water use, conservation, groundwater recharge and wastewater and stormwater management.
- *PSCU-O-16*: Ensure that adequate wastewater collection, treatment, recycling and disposal facilities are provided in a timely fashion to serve existing and future needs.
- *PSCU-P-46*: Adopt and implement a Water Efficient Landscaping Ordinance for new and/or refurbished development that exceeds mandated sizes, and ensure that all new City parks, streetscapes, and landscaped areas conform to the Ordinance's requirements. The Ordinance should include provisions to optimize outdoor water use by:
  - Promoting appropriate use of plants and landscaping;

- Establishing limitations on use of turf including size of turf areas and use of cool-season turf such as Fescue grasses, with exceptions for specified uses (e.g., recreation playing fields, golf courses, and parks);
- Establishing water budgets and penalties for exceeding them;
- Requiring automatic irrigation systems and schedules, including controllers that incorporate weather-based or other self-adjusting technology;
- Promoting the use of recycled water; and
- Minimizing overspray and runoff.
- *PSCU-P-58*: Coordinate urban growth management planning with public and private utilities. Develop and carry out an infrastructure and public services assessment during annexation reviews to determine infrastructure needs, feasibility, timing, and financing.
- *PSCU-P-60*: Require new developments to incorporate floodwater detention basins into Project designs where consistent with the Stormwater Master Plan and the Groundwater Recharge Plan.
- *PSCU-P-61*: Control urban and stormwater runoff and point and non-point discharge of pollutants. As part of the City's Stormwater Management Program, adopt and implement a Stormwater Management Ordinance to minimize stormwater runoff rates and volumes, control water pollution, and maximize groundwater recharge. New development will be required to include Low Impact Development features that reduce impermeable surface areas and increase infiltration. Such features may include, but are not limited to:
  - Canopy trees or shrubs to absorb rainwater;
  - Grading that lengthens flow paths over permeable surfaces and increases runoff travel time to reduce the peak hour flow rate;
  - Partially removing curbs and gutters from parking areas where appropriate to allow stormwater sheet flow into vegetated areas;
  - Use of permeable paving in parking lots and other areas characterized by significant impervious surfaces;
  - On-site stormwater detention, use of bioswales and bioretention basins to facilitate infiltration; and
  - Integrated or subsurface water retention facilities to capture rainwater for use in landscape irrigation and other non-potable uses.
- *PSCU-P-63*: Periodically evaluate the City's solid waste management system to ensure that operations are as cost-effective as feasible.
- *PSCU-P-64*: Develop a quadrant transfer station for the Southwest part of the City.
- *PSCU-P-67*: Promote solid waste reduction, recycling, and composting to Visalia residents and business as an important way to conserve limited natural resources.

## **Discussion**

- a) Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or**

**telecommunications facilities, the construction or relation of which could cause significant environmental effects?**

**Less than Significant Impact:** The proposed Project would result in new water services. Visalia's current system for water and wastewater has the capacity to provide service to the Projected growth as anticipated in the General Plan (Sanitary Sewer Master Plan (1994)). As the Project area is immediately adjacent to the existing TCOE facility and TCOE's existing connection to the City's wastewater collection system, the expanded area could readily be connected to the City's sewer system. As with any new development, an applicant for new development would be required to pay applicable impact fees. It is not anticipated that implementation of the proposed Project would result in increased demand for any utility services (i.e., relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities) beyond the planned conditions. Therefore, based on the information and analysis provided herein, there would be *a less than significant impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**b) Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?**

**Less than Significant Impact:** Cal Water would provide water services. The City's water supply source is comprised of 75 operational groundwater wells. The system currently has the capacity to pump 100,829 acre-feet per year (AFY or afy), all from groundwater. The Project does not propose any new or expanded uses that would be inconsistent with the Visalia General Plan. The available water supply is anticipated to adequately supply the Project. The Project is anticipated to use approximately 57,845 gallons per week (or 3,007,940 gallons per year); or conservatively calculated as approximately 9.23 AFY during a 52-week year. To compensate for the costs of these services, new developments will be required to pay impact fees for new water services, in addition to reduced water use policies contained in the Visalia General Plan. Therefore, based on the information and analysis provided herein, the impact would be *less than significant*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

- c) Would the Project result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?**

**Less than Significant Impact:** The Water Reclamation Facility (WRF) provides municipal sewerage services to 96,000 residents in the city of Visalia. The WRF has a design capacity of 22 million gallons per day (mgd). The overall projected waste flow rate by the Project would be approximately 9,234 gallons per day (or approximately 46,171 gallons per 5-day work week) or conservatively calculated as approximately 9.23 AFY during a 52-week year. Daily waste flow of 9,234 gallons per day is approximately 0.0092 mgd. The contribution of wastewater to the WRF by this Project would be approximately 0.00042% of the WRF's total design capacity. As such, the WRF would be able to accommodate the demands from this Project and thereby allow it to adequately serve the Project. Therefore, based on the information and analysis provided herein, the Project would result in a *less than significant impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

- d) Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

**Less than Significant Impact:** The Project would not result in solid waste in excess of State or local standards and would not result in increased generation of solid waste beyond typical generation of per capita contributions of solid waste. Additionally, the County's disposal sites are currently at less than half of their projected capacity and could accommodate the solid waste generated by the Project. As such, it can be reasonably determined that the existing solid waste infrastructure (e.g., landfilling, recycling, and green waste) has sufficient capacity to accommodate the proposed Project. As such, the Project would not generate solid waste more than State or Local Standards. Therefore, based on the information and analysis provided herein, there would be a *less than significant impact*.

- e) Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

**Less than Significant Impact:** This proposed Project conforms to all applicable statutes and regulations related to solid waste disposal. The proposed Project will be required to comply with the adopted policies related to solid waste and would also be required to comply with all applicable federal, state, and local statutes and regulations pertaining to disposal of solid waste, including recycling. Therefore, based on the information and

analysis provided herein, the proposed Project would result in a *less than significant impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**Cumulative Impact: Less than Significant.**

The cumulative analysis area is the Visalia Planning Area. As noted earlier, although the Project site is currently located on land zoned by Tulare County for agricultural use (AE-20), it is directly adjacent to the existing TCOE Administrative Office which is designated as Mixed Use Commercial (C-MU) by the City of Visalia's General Plan. Also as noted earlier, the Project is ideally located in an area ripe for annexation and subsequent development, and is a reasonable expansion of the existing TCOE Administrative facility. Other administrative processes include City of Visalia Pre-Zone Application; Tulare County Local Agency Formation Commission (LAFCO) – Reorganization (Annexation) Application; City of Visalia City Limits Boundary Change/Annexation; General Plan Amendment; Lot Line Adjustment; and Conditional Use Permit. As such, the area where the Project will be located would be consistent with the City's anticipated growth areas. The provision of City services is critical to annexation into the City. The Project proponent is aware of the City's requirement that utilities and services are provided consistent with City policies. As such, the Project would either connect to or include construction of new infrastructure to provide vital public services (such as water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities). Also, the Project proponent would be required to ensure that sufficient water supplies are available to serve the Project during normal, dry and multiple dry years. Further, the Project can be accommodated by the existing wastewater treatment provider (i.e., the City of Visalia) which has adequate capacity to serve the Project's projected demand (in addition to the provider's existing commitments). Solid waste would not be generated in excess of State or local standards, nor would it be in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals which would allow the Project to comply with federal, state, and local management and reduction statutes and regulations related to solid waste. In summary, the Project would not result in significant environmental effects to the Utilities and Service System resource. As such, based on the information and analysis provided herein, the Project would result in a *less than significant cumulative impact*.

XX. WILDFIRE

<b>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Environmental Setting**

There are no State Responsibility Areas (SRAs) within the vicinity of the Project site, and the Project site is not categorized as a “Very High” Fire Hazard Severity Zone (FHSZ) by CalFire. This CEQA Checklist Item only applies to areas within or near an SRA or a Very High FHSZ.

**Regulatory Setting**

**Federal**

None that apply to the Project.

**State**

*Fire Hazard Severity Zones*

Geographical areas designated pursuant to California Public Resources Codes Sections 4201 through 4204 and classified as Very High, High, or Moderate in State Responsibility Areas or as Local Agency Very High Fire Hazard Severity Zones designated pursuant to California Government Code, Sections 51175 through 51189. The City is not near or within any of the zones.

## **Regional/Local**

### *Tulare County Multi-Jurisdictional Local Hazard Mitigation Plan*

The Tulare County MJLHMP outlines wildfires as a potential and very likely phenomenon to occur within the county. Specifically, wildfire threat is highest where the valley floor becomes the foothills of the Sierra Nevada Mountain Range. Fuels, terrain, and weather all contribute to this increased likelihood of fire and are all considered when CAL FIRE maps fire hazards in the county. Though about 60 percent of the county is categorized as being in a high or very high wildfire hazard area, no part of the City of Visalia is included in these hazard areas. According to this document, wildfires in Visalia are considered unlikely in frequency, limited extent, and limited magnitude.

## **Discussion**

### **a) Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?**

**No Impact:** the proposed Project site is not located within an SRA or a Very High FHSZ. The Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Additionally, at the local level the Visalia Fire Department will evaluate the Project to ensure the Project does not impair emergency response or emergency evacuation. As such, based on the information and analysis provided herein, there would be *no impact*.

#### **Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

### **b) Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

**No Impact:** The Project is located on a flat area of currently agricultural productive land and is adjacent to urban development which is considered to be at low risk of fire. Additionally, as noted earlier, the proposed Project site is not located within an SRA or a Very

High FHSZ. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

- c) Would the Project 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?**

**Less than Significant Impact:** Construction of the Project involves adding a new access/egress point from Avenue 264/Liberty Road. The existing access/egress point from Mooney Boulevard (SR 63) would remain and could also be utilized to access/egress the expanded TCOE/AOCC Project area. Utilities such as emergency water sources and power lines would be included as part of the proposed development; however, all improvements would be subject to City standards and Visalia Fire Department approval. As such, the proposed Project would not exacerbate fire risk. Therefore, based on the information and analysis provided herein, the impact would be *less than* significant.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

- d) Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes?**

**No Impact:** The Project site is not located within or near an area designated as a Fire Hazard Severity Zone. As the land associated with the Project site is relatively flat, there would be no risk of downslope or downstream flooding or landslides as a result of post-fire instability or drainage changes. Therefore, based on the information and analysis provided herein, there would be *no impact*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required*.

**Mitigation Measures: None required.**

Based on the information and analysis provided herein, *no mitigation measures would be required.*

**Cumulative Impact: No impact.**

The cumulative impact area is the Visalia Planning Area. Importantly, and foremost, the proposed Project site is not located within or near an SRA or a Very High FHSZ. As noted earlier, the Project is located on a relatively flat area of currently agricultural land and is adjacent to urban development (which is considered to be at low risk of fire). The Project involves adding access/egress from Avenue 264/Liberty Road at the southernmost area of the Project. New utilities (such as emergency water sources and power lines) would be subject to City standards and Fire Chief approval. As the land associated with the Project site is relatively flat, there would be no risk of downslope or downstream flooding or landslides as a result of post-fire instability or drainage changes. Therefore, based on the information and analysis provided herein, cumulative wildfire-related impacts would be *less than significant.*

MANDATORY FINDINGS OF SIGNIFICANCE

<b>Would the Project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Does the Project have the potential substantially to 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the Project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the Project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion**

The following discussion regarding cumulative impacts is based on the conclusions from supporting technical studies by Taylored Archaeology (for cultural and tribal cultural resources), Core Environmental Consulting (for air quality, (including a health risk assessment), energy, and greenhouse gases resources), 4Creeks (Traffic Impact Analysis), and Colibri Ecological Consulting, LLC (biological resources), and the information and analysis provided earlier.

**a) Does the Project have the potential to 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, 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 Impact with Mitigation:** This Initial Study/Mitigated Negative Declaration found that the Project may have potentially significant impacts on cultural/tribal cultural resources, and geology and soils (limited to paleontological resources). As such, based on the information and analysis provided herein, implementation of the identified mitigation measures for each respective section would ensure that impacts would be *less than significant with mitigation*. See Mitigation Measures BIO-1 through BIO-6; and CUL-1 and CUL-2.

- b) Does the Project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects)?**

**Less than Significant Impact:** CEQA Guidelines Section 15064(h) states that a Lead Agency shall consider whether the cumulative impact of a Project is significant and whether the effects of the Project are cumulatively considerable. The assessment of the significance of the cumulative effects of a Project must, therefore, be conducted in connection with the effects of past Projects, other current Projects, and probable future Projects. Due to the nature of the Project and consistency with environmental policies, incremental contributions to impacts are considered less than cumulatively considerable. The proposed Project would not contribute substantially to adverse cumulative conditions, or create any substantial indirect impacts (i.e., increase in population could lead to an increased need for housing, increase in traffic, air pollutants, etc.). Therefore, based on the information and analysis provided herein, impacts would be *less than significant*.

- c) Does the Project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?**

**Less Than Significant Impact:** The analyses of environmental issues contained in this Initial Study have concluded that the Project would not have substantial impact on human beings, either directly or indirectly. Mitigation Measures, as applicable, have been incorporated into the Project design to reduce all potentially significant impacts to less than significant. Therefore, based on the information and analysis provided herein, there would be a *less than significant* impact.

**3.6 MITIGATION MONITORING AND REPORTING PROGRAM**

As required by Public Resources Code Section 21081.6, subd. (a)(1), a Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the Project in order to monitor the implementation of the mitigation measures that have been adopted for the Project. This Mitigation Monitoring and Reporting Program (MMRP) has been created based upon the findings of the Initial Study/Mitigated Negative Declaration (IS/MND) for the Barr-Wood Subdivision Project in the City of Visalia.

The first column of the table identifies the mitigation measure. The second column names the party responsible for carrying out the required action. The third column, "Timing of Mitigation Measure" identifies the time the mitigation measure should be initiated. The fourth column, "Responsible Party for Monitoring," names the party ensuring that the mitigation measure is implemented. The last column will be used by the City to ensure that the individual mitigation measures have been monitored.

Plan checking and verification of mitigation compliance shall be the responsibility of the City of Visalia.

**Table 3-19. Mitigation Monitoring and Reporting Program**

Mitigation Measure	Responsible Party for Implementation	Implementation Timing	Responsible Party for Monitoring	Verification
<b>Agricultural Resources</b>				
<p><b>Mitigation Measure AG-1:</b>                      Prior to the issuance of grading or building permits, the Project proponent shall mitigate impacts to Prime Farmland on the Project site at a 1:1 ratio or as determined by the City of Visalia. The amount of land requiring mitigation shall correspond to the amount of land associated with the issuance of the grading or building permit, or for residential land associated with a subdivision map, the amount of land associated with the subdivision map.</p> <p>The Project proponent shall implement one or more of the following measures to mitigate the loss: Payment of in-lieu fees, mitigation</p>	Project Applicant	Prior to the Start of Construction	Contractor /Lead Agency	

<p>banks, fee title acquisition, and/or conservation easements, on land(s) within the Southern San Joaquin Valley of California, specifically within Kern County, Tulare County, Kings County, Fresno County, or Madera County. The City shall require, at a minimum: evidence that the preserved land has adequate water supply, agricultural zoning, evidence of land encumbrance documentation, documentation that the easement/regulations are permanent and monitored, and documentation that the mitigation strategy is appropriately endowed.</p>				
<p><b>Biological Resources</b></p>				
<p><b>Mitigation Measure BIO-1: Protect Nesting Swainson’s hawks</b></p> <p>1. To the extent practicable, construction shall be scheduled to avoid the Swainson’s hawk nesting season, which extends from March through August.</p> <p>2.If it is not possible to schedule construction between September and February, a qualified biologist shall conduct a pre-construction clearance survey for Swainson’s hawk in accordance with the Swainson’s Hawk Technical Advisory Committee’s Recommended Timing and Methodology for Swainson’s Hawk Nesting Surveys in California’s Central Valley (SWTAC 2000). A pre-construction survey shall be conducted no more than 14 days prior to the initiation of construction activities. During the pre-construction clearance survey, the qualified biologist shall inspect all potential nest substrates within a minimum 0.5-mile radius around the Project site.</p>	<p>Project Applicant</p>	<p>Prior to the Start of Construction</p>	<p>Contractor /Lead Agency</p>	
<p><b>Mitigation Measure BIO-2: Protect roosting pallid bat and western mastiff bat.</b></p>				

<p>1. In consultation with the City of Visalia, implement the City's Valley Oak Tree Management Plan or obtain the required Oak Tree Removal Application (accessed at: <a href="https://www.visalia.city/civicax/filebank/blobdload.aspx?BlobID=51066">https://www.visalia.city/civicax/filebank/blobdload.aspx?BlobID=51066</a>) and provide the required compensatory mitigation as determined by the City of Visalia for impacts to Valley Oak Trees. The documents can be accessed at the City's website at: <a href="https://www.visalia.city/civicax/filebank/blobdload.aspx?BlobID=3806">https://www.visalia.city/civicax/filebank/blobdload.aspx?BlobID=3806</a> and <a href="https://www.visalia.city/civicax/filebank/blobdload.aspx?BlobID=51066">https://www.visalia.city/civicax/filebank/blobdload.aspx?BlobID=51066</a>; respectively.</p>				
<p>2. If an active roost is found close enough to the construction area to be disturbed by these activities, the qualified biologist shall determine the extent of a construction-free buffer to be established around the roost. If work cannot proceed without disturbing the roosting bats, work may need to be halted or redirected to other areas until the roost is no longer in use.</p>				
<p><b>Mitigation Measure BIO-3: Obtain a permit from the SWRCB for impacts to jurisdictional waters.</b></p>				
<p>1. Obtain a Waste Discharge Requirements permit from the SWRCB via the Central Valley Regional Water Quality Control Board if the Project is expected to permanently impact the detention basins and provide the required compensatory mitigation.</p>				
<p><b>Mitigation Measure BIO-4: Protect nesting birds</b></p>				
<p>1. To the extent practicable, construction shall be scheduled to avoid the nesting season, which extends from February through August.</p>				
<p>2. If it is not possible to schedule construction between September and January, pre-construction surveys for nesting birds shall be</p>				

<p>conducted by a qualified biologist to ensure that no active nests will be disturbed during the implementation of the Project. A pre-construction survey shall be conducted no more than 14 days prior to the initiation of construction activities. During this survey, the qualified biologist shall inspect all potential nest substrates in and immediately adjacent to the impact areas. If an active nest is found close enough to the construction area to be disturbed by these activities, the qualified biologist shall determine the extent of a construction-free buffer to be established around the nest. If work cannot proceed without disturbing the nesting birds, work may need to be halted or redirected to other areas until nesting and fledging are completed or the nest has otherwise failed for non-construction related reasons.</p>				
<p><b>Cultural Resources</b></p>				
<p><b>Mitigation Measure CUL-1:</b>                  In the event of accidental discovery of unidentified archaeological remains during development or ground-moving activities in the Project boundary, all work shall be halted in the immediate vicinity until a qualified archaeologist can identify the discovery and assess its significance. If determined to be significant, the qualified historical and/or archaeologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of</p>	<p>Project Applicant</p>	<p>Ongoing during construction</p>	<p>Contractor /Lead Agency</p>	

<p>the CEQA Guidelines and the City's Historic Preservation Ordinance.</p>				
<p><b>Mitigation Measure CUL-2:</b>          In the event that human remains are unearthed during construction-related activities (such as, earth shaping, excavating, grading, trenching, etc.), all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, 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. Also, pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner 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 landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.</p>	<p>Project Applicant</p>	<p>Ongoing during construction</p>	<p>Contractor /Lead Agency</p>	
<p><b>Paleontological Resources</b></p>				

<b>See CUL-1</b>				
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<https://www.visalia.city/civicax/filebank/blobdload.aspx?BlobID=3806>) or obtain the required Oak Tree Removal Application (accessed at:  
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## 4. List of Preparers

***Project Title: TCOE Expansion***

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### **List of Preparers**

#### **Tulare County Office of Education**

- Jeffrey Ramsay, Director of General Services

#### **4-Creeks Inc.**

##### Environmental document

- David Duda, AICP, Environmental Planning Director
- Hector Guerra, Senior Planner/CEQA Project Manager
- Nate Antepencko, Associate Planner (Air Quality emissions modeling [CalEEMOD])

##### Traffic Impact Analysis

- Lisa Wallis Dutra, Principal Traffic Engineer, Traffic Engineering Department
- Taryn Pascua, Civil Engineer, Traffic Engineering Department,
- Rachel Harrison, Assistant Civil Engineer, Traffic Engineering Department

### **Persons and Agencies Consulted**

The following individuals and agencies contributed to this Initial Study/Mitigated Negative Declaration:

#### **Biological Resources**

Biological Resource Evaluation (BRE)  
Colibri Ecological Consulting, LLC,

#### **Cultural Resources**

Phase 1 Cultural Resources Assessment for the Tulare County Office of Education Administration and Conference Center Expansion Project, City of Visalia, Tulare County, California Project  
Taylored Archaeology

#### **Air Quality, Greenhouse Gas, and Health Risk Assessment**

Technical Memorandum – Air Quality, Greenhouse Gas, and Health Risk Assessment for Tulare County Office of Education Administration and Conference Center Expansion

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Jesse Madsen  
Core Environmental Consulting

**Responsible Agency – City of Visalia**

Brandon smith – Principal Planner  
Jarred Olsen – Principal Planner  
Josh Dan – Senior Planner



# TECHNICAL MEMORANDUM

Jesse Madsen  
Owner, Principal Scientist  
3560 Argyle Avenue, Clovis, CA 93612  
[Jesse@CoreEnvironmentalConsulting.com](mailto:Jesse@CoreEnvironmentalConsulting.com)  
(559) 202-3941

Hector Guerra  
4Creeks, Inc.  
324 S. Santa Fe Street, Suite A  
Visalia, CA 93292

December 2, 2025

Subject: **Technical Memorandum – Air Quality, Greenhouse Gas, and Health Risk Assessment for Tulare County Office of Education Administration and Conference Center Expansion**

This Technical Memorandum (memo) has been prepared to summarize the methodology and results of an Air Quality (AQ), Greenhouse Gas (GHG), and Health Risk Assessment (HRA) for the Tulare County Office of Education (TCOE) Administration and Conference Center Expansion project (Project). TCOE proposes to expand and add facilities to its existing Administrative Office and Conference Center (AOCC) site at 6200 South Mooney Boulevard in Tulare County near Visalia, California.

The Project is subject to the California Environmental Quality Act (CEQA) and an Initial Study is in progress. This Technical Memo focuses on the quantification of criteria pollutants, health risks to sensitive receptors from toxic air contaminants (TAC), and greenhouse gas (GHG) emissions. Criteria pollutant emissions and health risks from TAC are also compared to numerical thresholds of significance established by the San Joaquin Valley Air Pollution Control District (SJVAPCD). GHG emissions, Vehicle Miles Traveled (VMT), and energy usage calculations from the California Emissions Estimator Model (CalEEMod) are included for information purposes as no related numerical thresholds of significance have been established.

This Technical Memo does not include in-depth discussions on se@ng, regulatory background, pollutant descriptions and sources, other impacts, or final determinations of impact significance. Appropriate discussions on all topics not included in this Technical Memo, including the full range of considerations for impact significance, should be included in the Initial Study. Among other considerations, the Initial Study should include assessments for consistency with established plans and regulations for the control of air quality and GHG.

Estimated criteria pollutant emissions and health risks from TAC would not exceed the SJVAPCD thresholds of significance. Therefore, the associated impacts would be **less than significant**, with regards to the numerical thresholds discussed.

## Project Description

TCOE proposes to expand and add facilities to its existing Administrative Office and Conference Center (AOCC) site at 6200 South Mooney Boulevard. TCOE has also acquired and mostly developed an adjacent parcel that will be merged with the main Project site to form a single parcel for development.

The main Project site is approximately 12.5 acres and would include:

- 108,000 square feet (sqB) of office and conference room space
- 3 classrooms, with a training kitchen, totaling 6,200 sqB
- 35,000 sqB of warehouse space

- Stormwater basin, parking, vehicular access, and other site improvements

The primary use of the Project will be to host professional development trainings and workshops for TCOE employees.

In addition to the expansion, TCOE previously completed construction of an Administration and Conference Center on an adjacent 11-acre parcel. An Initial Study and Mitigated Negative Declaration (IS/MND) was completed for the previous project, which included 87,000 square feet of building space, consisting of a three-story office building, a conference center, and associated parking and site improvements. The existing conference center is used to host conferences and educational training.

The existing site would be merged with the Project for planning purposes, and the combined development parcel would be annexed into the City of Visalia. Except for the minor site work shown on the attached Demolition Plan, the existing site is not included in the analyses performed for this Tech Memo because an IS/MND was previously completed and there would be no changes to operational characteristics.

Project construction will commence after all permits and bidding have been completed. To allow for the earliest (and most health-conservative for an AQ/GHG/HRA analysis) start date, construction was assumed to begin January 1, 2026 and last for the default duration estimated by CalEEMod.

#### Criteria Pollutants

Criteria pollutant emissions were estimated using the latest version of CalEEMod. Land uses were modeled as follows:

- Conference room – government office building
- Classrooms – junior community college
- Warehouse – unrefrigerated warehouse, no rail
- Parking – parking lot
- Driveways – other asphalt areas
- Stormwater basin, concrete – other non-asphalt area

The operational characteristics of the uses selected for the conference room, classrooms, and warehouse would overestimate the actual vehicle trips and resource usages of the Project, but were selected as health-conservative options that most closely match based on the CalEEMod User Guide. Areas were estimated from the attached Site Plan.

The CalEEMod results are included as Attachment 2 and summarized in the table below, along with comparisons to the SJVAPCD thresholds of significance.

**Table 1 Criteria Pollutant Emissions Compared to SJVAPCD Thresholds of Significance (tons per year)**

CONSTRUCTION	CO	NO <sub>x</sub>	ROG	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction Emissions (mitigated, worst year)	2.1	1.6	0.40	<0.005	0.28	0.15
SJVAPCD Threshold of Significance	100	10	10	27	15	15
<b>Exceeds Threshold?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
OPERATION	CO	NO <sub>x</sub>	ROG	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Operational Emissions	10	1.7	2.0	0.03	2.3	0.62
SJVAPCD Threshold of Significance	100	10	10	27	15	15
<b>Exceeds Threshold?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
CO = carbon monoxide NO <sub>x</sub> = oxides of nitrogen ROG = reactive organic gases SO <sub>x</sub> = oxides of sulfur; sulfur dioxide (SO <sub>2</sub> ) is the primary constituent and essentially equivalent PM <sub>10</sub> = particulate matter with an aerodynamic diameter less than 10 microns PM <sub>2.5</sub> = particulate matter with an aerodynamic diameter less than 2.5 microns						

As shown in the table above, Project construction and operational emissions of criteria pollutants not exceed SJVAPCD thresholds of significance. Therefore, with respect to the numerical thresholds, impacts would be **less than significant**.

As explained in the introduction of this Technical Memo, the Initial Study must include additional considerations including, but not limited to, an assessment of Project consistency with established air quality plans and regulations. The broader discussion of impact significance is deferred to the Initial Study; however, it is noted here that, generally, Projects with emissions below the SJVAPCD thresholds of significance and that comply with SJVAPCD air quality plans and regulations can be presumed to have a less-than-significant individual and cumulative impact to air quality.

It should be noted that emissions were estimated without including any non-default regulatory or mitigation measures (except for Mitigation Measure HRA-1). Emissions are therefore expected to be lower with implementation of all State, regional, and local measures. Some of the impact measures include clean vehicle and fuel regulations, the California Green Building Standards Code (CalGreen), anti-idling, SJVAPCD Regulation VIII (Fugitive PM<sub>10</sub> Prohibitions), and SJVAPCD Rule 9510 (Indirect Source Review).

**Ambient Air Quality**

The exposure of sensitive receptors to substantial pollutant concentrations can occur if the Project would result in localized exceedances of National or California Ambient Air Quality Standards (NAAQS/CAAQS), or if Project emissions of Toxic Air Contaminants (TAC) would exceed SJVAPCD thresholds of significance (discussed in the HRA section below). SJVAPCD has determined that, if maximum Project criteria pollutant emissions are below 100 pounds per day for each pollutant, it can be concluded that the Project would not result in a localized exceedance of NAAQS or CAAQS and no further Ambient Air Quality Analysis (AAQA) is required.

Following the SJVAPCD methodology presented in Application Review Policies (APR) 2030 (Project Ambient Air Quality Analysis Applicability Determination under CEQA)<sup>1</sup>, the Project was first assessed to determine whether it would be subject to Indirect Source Review (ISR). The Project site is over the square footage thresholds listed in Rule 9510 and would therefore be subject. Maximum daily criteria pollutants resulting from construction and operation were then calculated as described in the Criteria Pollutants section above.

<sup>1</sup> (San Joaquin Valley Air Pollution Control District , 2018)

Maximum daily criteria pollutant emissions are compared to the 100-lb-per-day AAQA applicability threshold in the table below.

**Table 2 Maximum Daily Criteria Pollutant Emissions Compared to AAQA Screening Threshold (lb/day)**

CONSTRUCTION	CO	NOx	ROG	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction Emissions (max daily, worst year, worst season)	29	29	38	0.05	21	11
<b>Exceeds 100 lb/day?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
OPERATION	CO	NOx	ROG	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Operational Emissions (max daily, worst season)	94	13	15	0.21	18	4.7
<b>Exceeds 100 lb/day?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
CO = carbon monoxide NOx = oxides of nitrogen ROG = reactive organic gases SOx = oxides of sulfur; sulfur dioxide (SO <sub>2</sub> ) is the primary constituent and essentially equivalent PM <sub>10</sub> = particulate matter with an aerodynamic diameter less than 10 microns PM <sub>2.5</sub> = particulate matter with an aerodynamic diameter less than 2.5 microns						

It is worth noting that, although the worst daily operational CO emissions are estimated to come near the 100 pound per day threshold, the emissions are an overestimation compared to actual operational characteristics and, more important, an AAQA is only required to consider on-site emissions and off-site emissions within ¼ mile of the project boundary. Since most of the emissions are from vehicle trips, with trip lengths averaging over 9 miles, the onsite CO emissions for consideration under an AAQA would be far lower.

As shown in the table above, none of the criteria pollutants would exceed 100 pounds per day, during construction or operation. Therefore, no further AAQA is required and the Project would not expose sensitive receptors to substantial pollutant concentrations by resulting in a localized exceedance of NAAQS or CAAQS. With respect to the numerical threshold established by SJVAPCD, the associated impact would be **less than significant**. No mitigation is required outside of compliance with existing regulations. As discussed in the Criteria Pollutants section above, emissions are expected to be further reduced with implementation of all State, regional, and local measures.

**Health Risk Assessment**

The Health Risk Assessment (HRA) in this Technical Memo was prepared in accordance with the guidelines outlined in the Office of Environmental Health Hazard Assessment (OEHHA) *Guidance Manual for Preparation of Health Risk Assessments*<sup>2</sup>; SJVAPCD Policy APR 1906 – *Framework for Performing Health Risk Assessments*<sup>3</sup> and *Guidance for Air Dispersion Modeling*<sup>4</sup>. The reader is encouraged to reference those sources, along with the SJVAPCD *Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI)*<sup>5</sup> for in-depth discussions regarding se@ng, regulatory background, pollutant descriptions, and HRA methodologies, as this Technical Memo includes only a critical summary of the project-specific HRA methodology and results.

The primary Toxic Air Contaminants (TAC) of concern include diesel particulate matter (DPM) emissions from diesel-fueled construction vehicle and equipment use. Operation would not include any substantial sources of DPM or any other substantial sources of TAC.

<sup>2</sup> (Office of Environmental Health Hazard Assessment, 2015)

<sup>3</sup> (San Joaquin Valley Air Pollution Control District, 2020)

<sup>4</sup> (San Joaquin Valley Air Pollution Control District, 2022a)

<sup>5</sup> (San Joaquin Valley Air Pollution Control District, 2015)

The United States Environmental Protection Agency’s (U.S. EPA) *American Meteorological Society/EPA Regulatory Model* (AERMOD) air dispersion model was used to model the annual downwind air concentration at nearby receptors, based on a normalized emission rate of one gram per second. Meteorological data was obtained from SJVAPCD (Visalia met site); CARB and SJVAPCD recommended modeling parameters were used throughout. Construction emissions were modeled as an area source with dimensions matching the Project site. Discrete worker and residential receptors were added based on business and residence locations shown on the imported Google Earth base map; a total of 36 receptors were added for a representative analysis. Terrain was added using the built in WebGIS tool.

Construction DPM emissions were estimated using CalEEMod, as described in the Criteria Pollutants section above. SJVAPCD considers PM<sub>10</sub> exhaust to be a reasonable surrogate for DPM, and the maximum (worst year) annual emissions were used for subsequent calculations.

Normalized downwind air concentrations for each receptor (modeled in the step above) were imported into the CARB Hotspots Analysis and Reporting Program (HARP2) *Air Dispersion Modeling and Risk Tool* (ADMRT) and combined with the toxic emissions data to estimate the ground level concentrations of TAC at each receptor. A separate run was performed for worker risk because the highest risk receptor would be at the existing TCOE facilities just west of the site. The exposure duration was set to two years, rounded up from the 1.3 year construction timeline. The construction risk calculations included the area source described in the modeling above and annual emissions of DPM. OEHHA has not established a Reference Exposure Level (REL) for 8-hour chronic, or acute health risk from DPM. Thus, the 8-hour chronic and acute HI are not calculated, except in unusual situations such as when a sensitive receptor is located directly above the emission release point (e.g., on a hillside or in a multistory apartment building).

Results of the AERMOD modeling and ADMRT calculations are included as Attachment 3, along with a map of receptors. Modeling input and output files will be made available to reviewing agencies upon request. The highest risks calculated for each scenario are presented in the table below, along with comparisons to SJVAPCD thresholds of significance. All results are the maximally exposed individual (MEI) for each scenario.

**Table 3 Health Risk Assessment Results Compared to Thresholds of Significance**

RISK	CARCINOGEN (risk in one million)	CHRONIC HAZARD INDEX
Construction Health Risk	15.7 (Receptor 6)	0.0092 (Receptor 6)
Thresholds of Significance	20	1
<b>Exceeds Threshold?</b>	<b>NO</b>	<b>NO</b>

<sup>1</sup>No HI calculated for Construction DPM Acute risk because OEHHA has not established REL.

As shown in the table above, the highest risks occurred at Receptor 6, a residence located adjacent to the north side of the Project site. Initial calculations indicated that the highest risks could occur at Receptor 28; however, that receptor location is an existing TCOE facility adjacent to the west side of the Project site. Risks were recalculated for Receptor 28 as a worker and the results were substantially lower than the risks to residential Receptor 6 and well under the SJVAPCD thresholds of significance.

Calculated risks would not exceed SJVAPCD thresholds of significance. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations resulting from TAC emissions. Impacts would be **less than significant**.

As discussed in the Criteria Pollutants section above, emissions would be further reduced with implementation of all State, regional, and local measures.

**Greenhouse Gases, Vehicle Miles Travelled, and Energy Use**

Greenhouse Gases (GHG), Vehicle Miles Travelled (VMT), and Energy use were all estimated using CalEEMod, as described in the Criteria Pollutants section above. The full detailed report is included in Attachment 2 CalEEMod Results. Summaries are provided in the tables below for information purposes only. No discussion is provided in this Technical Memo regarding impact significance. As discussed in the Criteria Pollutants section above, emissions are expected to be even lower with implementation of all State, regional, and local measures.

**Table 4 Project Greenhouse Gas Emissions (metric tons per year)**

CONSTRUCTION	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Construction Emissions (worst year)	---	339	339	0.01	0.01	0.04	342
OPERATION	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Operational Emissions	18.7	5,035	5,054	2.35	0.42	741	5,979
<i>BCO2 = biogenic carbon dioxide</i> <i>NBCO2 = non-biogenic (anthropogenic) carbon dioxide</i> <i>CO2T = total carbon dioxide</i> <i>CH4 = methane</i> <i>N2O = nitrous oxide</i> <i>R = refrigerants</i> <i>CO2e = carbon dioxide equivalents (total)</i>							

**Table 5 Project Energy Use by Land Use**

LAND USE	ELECTRICITY (kWh/yr)	NATURAL GAS (kBTU/yr)
Government Office Building (Conference Center)	2,084,306	3,968,973
Junior College (Classrooms)	64,808	277,206
Unrefrigerated Warehouse – No Rail	187,044	581,580
Parking Lot	70,255	0
<b>TOTAL</b>	<b>2,406,413</b>	<b>4,827,759</b>
<i>kWh/yr = kilowatt-hours per year</i> <i>kBTU/yr = thousand British Thermal Units per year</i>		

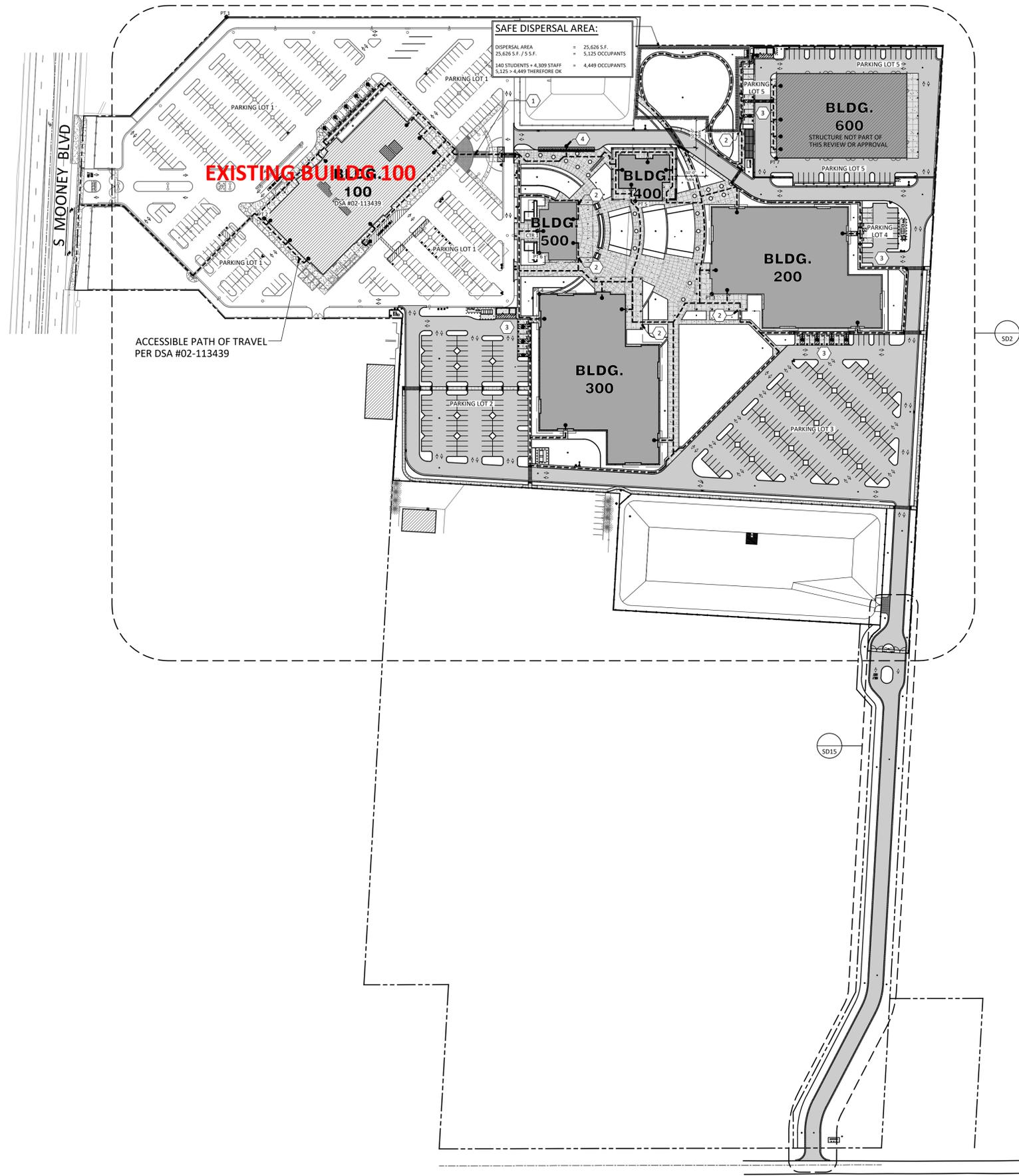
**Table 6 Project Operational Mobile Sources**

LAND USE	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Government Office Building (Conference Center)	2,440	0	0	636,070	22,867	0	0	5,961,848
Junior College (Classrooms)	126	70	7.5	36,754	1,177	653	70	344,497
Unrefrigerated Warehouse – No Rail	61	61	61	22,229	571	571	571	208,346
<b>TOTAL</b>	<b>2,627</b>	<b>131</b>	<b>69</b>	<b>695,053</b>	<b>24,615</b>	<b>1,224</b>	<b>641</b>	<b>6,514,691</b>
<i>VMT = vehicle miles travelled</i>								

### References

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**Attachments: Attachment 1 Site Plans; Attachment 2 CalEEMod Results; Attachment 3 HRA Results.**



ATTACHMENT 1 - SITE PLANS

SITE PLAN LEGEND:

- NEW BUILDING
- STRUCTURE NOT PART OF THIS REVIEW OR APPROVAL
- (E) BUILDING
- SAFE DISPERSAL AREA
- ACCESSIBLE RESTROOMS, SEE FLOOR PLANS FOR GENDER
- PROPERTY LINE
- ACCESSIBLE PATH OF TRAVEL
- NEW CONCRETE PAVING
- NEW ASPHALT PAVING
- CONTROL POINT, SEE TABLE ON SD2

SITE PLAN KEYNOTES:

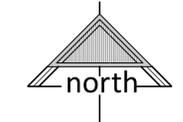
- 1 ACCESSIBLE PATH OF TRAVEL :  
PATH OF TRAVEL (P.O.T.) AS VERIFIED BY THE ARCHITECT IS:  
- A COMMON BARRIER FREE ACCESSIBLE ROUTE AT LEAST 48" WIDE WITHOUT ANY ABRUPT VERTICAL CHANGES EXCEEDING 1/2" BEVELLED AT 1:2 MAXIMUM SLOPE, EXCEPT THAT LEVEL CHANGES DO NOT EXCEED 1/4" VERTICAL.  
- THE PATH SURFACE IS SLIP RESISTANT, STABLE, FIRM, AND SMOOTH.  
- PASSING SPACES AT LEAST 60" x 60" ARE LOCATED NOT MORE THAN 200' APART (11B-403.5.3).  
- CONTINUOUS GRADIENTS HAVE 60" LEVEL AREAS NOT MORE THAN 400' APART (11B-403.7).  
- CROSS-SLOPE DOES NOT EXCEED 2%.  
- SLOPE IN THE DIRECTION OF TRAVEL IS 5% OR LESS UNLESS OTHERWISE INDICATED AS A RAMP.  
- MAINTAIN P.O.T. FREE OF OVERHANGING OBSTRUCTIONS TO 80" MINIMUM, PROTRUDING OBJECTS GREATER THAN 4" PROJECTION FROM WALL OR EDGE AND 27" ABOVE FINISH GRADE (11B-307.2).  
- GRATING LOCATED IN THE SURFACE OF ANY PEDESTRIAN WAY IN THE P.O.T. SHALL HAVE GRID/OPENINGS IN GRATING LIMITED TO 1/2" MAXIMUM CLEAR IN THE DIRECTION OF TRAVEL FLOW
- 2 GATE ACCESS NOTE:  
ALL C.L. AND DECORATIVE METAL 4'-0" WIDE GATES IN THE PATH OF TRAVEL SHALL HAVE LEVER-TYPE LATCH AND 10" HIGH KICKPLATES SECURE TO C.L. MESH BOTH SIDES, SLBS MAX FORCE TO PUSH OR PULL OPEN (11B-404.2.9) AND SBLB MAX TO ACTIVATE OPERABLE PARTS (11B-304.9) AND STRIKE SIDE (MANEUVERING) CLEARANCE PER CBC 11B-404.2.4.1.
- 3 ACCESSIBLE PARKING:  
NEW ACCESSIBLE PARKING, SEE SHEET SD8  
PARKING LOT 1: 383 EXISTING PARKING STALLS PER DSA# 02-113439.  
8 ACCESSIBLE PARKING STALLS REQUIRED, 7 ACCESSIBLE PARKING STALLS AND 2 ACCESSIBLE VAN STALLS PROVIDED, 9 > 8 THEREFORE OK.  
PARKING LOT 2: 122 PARKING STALLS PER THIS APPLICATION.  
5 ACCESSIBLE PARKING STALLS REQUIRED, 3 ACCESSIBLE PARKING STALLS AND 2 ACCESSIBLE VAN STALLS PROVIDED, 5 = 5 THEREFORE OK.  
PARKING LOT 3: 200 PARKING STALLS PER THIS APPLICATION.  
7 ACCESSIBLE PARKING STALLS REQUIRED, 3 ACCESSIBLE PARKING STALLS AND 4 ACCESSIBLE VAN STALLS PROVIDED, 7 = 7 THEREFORE OK.  
PARKING LOT 4: 17 PARKING STALLS PER THIS APPLICATION.  
1 ACCESSIBLE PARKING STALLS REQUIRED, 1 ACCESSIBLE PARKING STALL PROVIDED, 1 = 1 THEREFORE OK.  
PARKING LOT 5: 51 PARKING STALLS PER THIS APPLICATION.  
3 ACCESSIBLE PARKING STALLS REQUIRED, 2 ACCESSIBLE PARKING STALLS AND 2 ACCESSIBLE VAN STALLS PROVIDED, 4 > 3 THEREFORE OK.
- 4 PASSENGER LOADING ZONES:  
DROP-OFF ZONES SHALL PROVIDE AN ACCESS AISLE AT LEAST 60" WIDE AND 20' LONG ADJACENT AND PARALLEL TO THE VEHICLE PULL UP SPACE. SUCH ZONES SHALL BE LOCATED ON A SURFACE WITH A SLOPE NOT OVER 2%.

EV PARKING					
LOT #	# OF STALLS	EV CAPABLE REQ'D	# OF EV CAPABLE	EV CHARGERS REQ'D	# OF EV CHARGERS
2 + 3 + 4 (PUBLIC PARKING)	338	68	68	18	18
(FLEET PARKING)	50	10	48	3	48

REFER TO ENLARGED SITE PLANS, SHEETS SD4-SD7 FOR LOCATION OF EV CAPABLE STALLS AND EV CHARGERS.

OVERALL SITE PLAN

SCALE: 1" = 100'-0"



DATE: JANUARY 24, 2025

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(559) 627.0530 Office  
(559) 627.1926 Fax

TITLE  
OVERALL SITE PLAN

SD1

PROJECT 23098

IDENTIFICATION STAMP  
DIV. OF THE STATE ARCHITECT  
APP: 02-122991 INC:  
REVIEWED FOR  
SS  FLS  ACS   
DATE: 11/21/2025



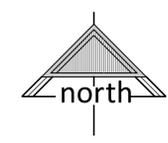
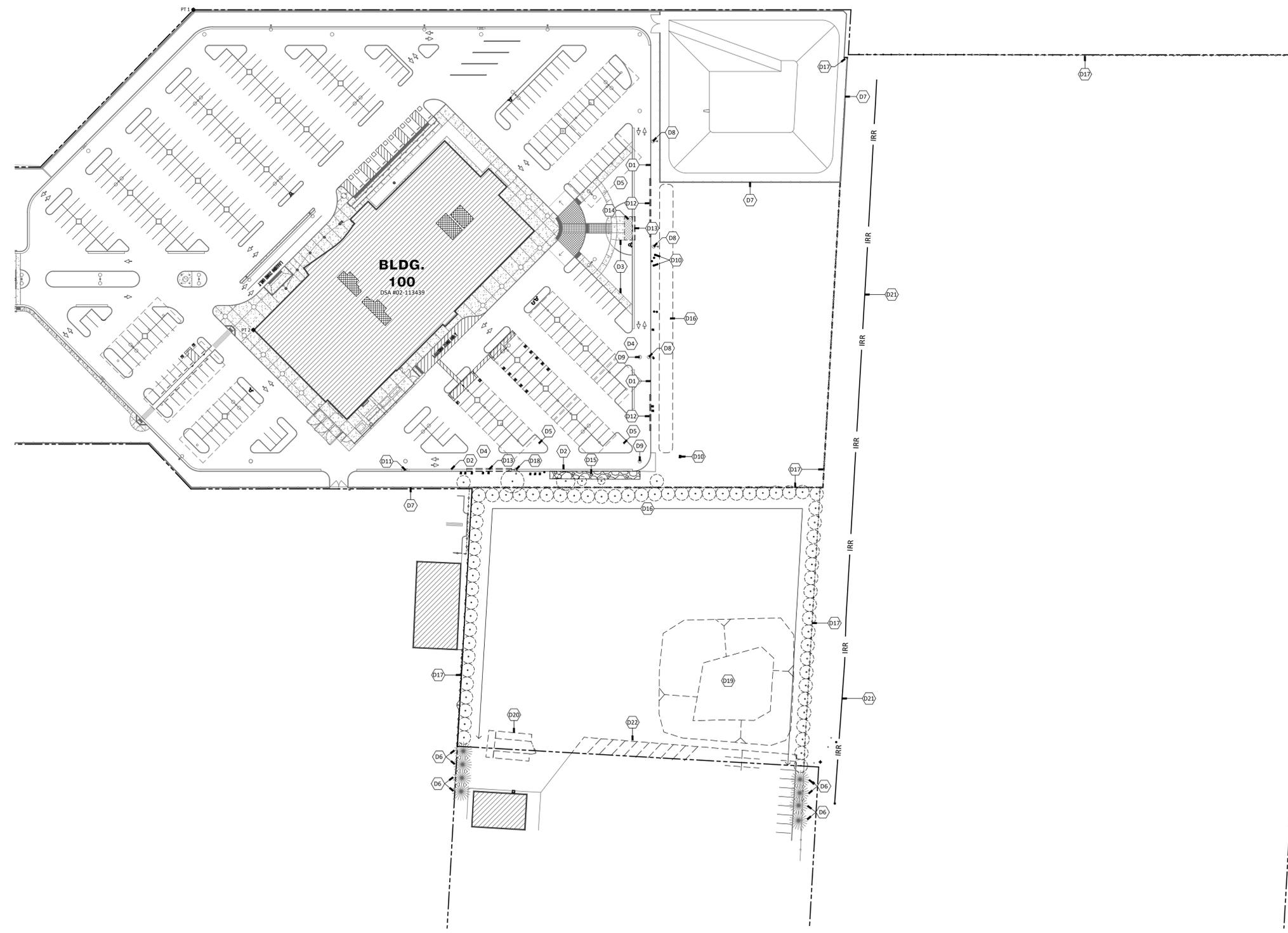
DATE: JANUARY 24, 2025

**DEMO SITE PLAN LEGEND:**

- (E) BUILDING
- (E) CONCRETE TO BE DEMOLISHED
- (E) ASPHALT TO BE DEMOLISHED
- (E) OBJECT TO BE DEMOLISHED
- (E) CHAIN LINK FENCE TO BE DEMOLISHED
- (E) CHAIN LINK FENCE, PROTECT
- (E) TREE TO BE REMOVED, FILL & COMPACT ALL HOLES LEFT BY REMOVAL OF ROOT-BALLS.
- PROPERTY LINE
- CONTROL POINT

**DEMO SITE PLAN KEYNOTES:**

- D1 EXISTING CONCRETE CURB TO REMAIN
- D2 EXISTING CONCRETE CURB & GUTTER TO REMAIN
- D3 EXISTING CONCRETE PAVING TO REMAIN
- D4 EXISTING ASPHALT PAVING TO REMAIN
- D5 EXISTING TURF OR PLANTER TO REMAIN
- D6 EXISTING TREE TO REMAIN
- D7 EXISTING CHAIN LINK FENCE TO REMAIN
- D8 EXISTING LIGHT POLE TO REMAIN
- D9 EXISTING STORM DRAIN MANHOLE TO REMAIN
- D10 EXISTING UTILITY BOX TO REMAIN
- D11 EXISTING DRAIN INLET TO REMAIN
- D12 REMOVE EXISTING CONCRETE CURB
- D13 REMOVE EXISTING CONCRETE CURB & GUTTER
- D14 REMOVE EXISTING CONCRETE PAVING
- D15 REMOVE EXISTING RIVER ROCK
- D16 REMOVE EXISTING PLANT/TREE
- D17 REMOVE EXISTING CHAIN LINK FENCING/GATE
- D18 REMOVE EXISTING LIGHT POLE
- D19 REMOVE EXISTING CATCH BASIN, SEE CIVIL DWGS.
- D20 EXISTING SHIPPING CONTAINER TO BE SALVAGED TO ADJACENT PROPERTY OWNER
- D21 REMOVE EXISTING UNDERGROUND UTILITY LINE
- D22 REMOVE EXISTING AC PAVING



**DEMO SITE PLAN**

SCALE: 1" = 60'-0"

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TITLE  
DEMO  
SITE PLAN

**SD3**

PROJECT **23098**

# 25017 TCOE ACC (1st Run) Detailed Report

**ATTACHMENT 2 - CalEEMod  
Results**

## Table of Contents

1. Basic Project Information
  - 1.1. Basic Project Information
  - 1.2. Land Use Types
  - 1.3. User-Selected Emission Reduction Measures by Emissions Sector
2. Emissions Summary
  - 2.1. Construction Emissions Compared Against Thresholds
  - 2.2. Construction Emissions by Year, Unmitigated
  - 2.4. Operations Emissions Compared Against Thresholds
  - 2.5. Operations Emissions by Sector, Unmitigated
3. Construction Emissions Details
  - 3.1. Demolition (2026) - Unmitigated
  - 3.3. Site Preparation (2026) - Unmitigated
  - 3.5. Grading (2026) - Unmitigated
  - 3.7. Building Construction (2026) - Unmitigated
  - 3.9. Building Construction (2027) - Unmitigated

3.11. Paving (2027) - Unmitigated

3.13. Architectural Coating (2027) - Unmitigated

#### 4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

#### 4.8. Stationary Emissions By Equipment Type

##### 4.8.1. Unmitigated

#### 4.9. User Defined Emissions By Equipment Type

##### 4.9.1. Unmitigated

#### 4.10. Soil Carbon Accumulation By Vegetation Type

##### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

##### 4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

##### 4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

### 5. Activity Data

#### 5.1. Construction Schedule

#### 5.2. Off-Road Equipment

##### 5.2.1. Unmitigated

#### 5.3. Construction Vehicles

##### 5.3.1. Unmitigated

#### 5.4. Vehicles

##### 5.4.1. Construction Vehicle Control Strategies

#### 5.5. Architectural Coatings

#### 5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

## 7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

## 8. User Changes to Default Data

8.1. Justifications

# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	25017 TCOE ACC (1st Run)
Construction Start Date	1/1/2026
Operational Year	2028
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	1.9
Precipitation (days)	24
Location	11836 Avenue 264, Visalia, CA 93277, USA
County	Tulare
City	Unincorporated
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2784
EDFZ	9
Electric Utility	Eastside Power Authority
Gas Utility	Southern California Gas
App Version	2022.1.1.35

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Government Office Building	108	1000sqft	2.5	108,000	0.00	0.00	—	—

Junior College (2yr)	6.2	1000sqft	0.14	6,200	0.00	0.00	—	—
Unrefrigerated Warehouse-No Rail	35	1000sqft	0.80	35,000	0.00	0.00	—	—
Other Non-Asphalt Surfaces	100	1000sqft	2.3	0.00	0.00	0.00	—	—
Parking Lot	80	1000sqft	1.8	0.00	0.00	0.00	—	—
Other Non-Asphalt Surfaces	33	1000sqft	0.77	0.00	0.00	0.00	—	—
Other Asphalt Surfaces	20	1000sqft	0.46	0.00	0.00	0.00	—	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.6	1.4	11	16	0.03	0.39	0.42	0.81	0.36	0.10	0.46	—	3,219	3,219	0.13	0.11	2.4	3,258
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	38	38	29	29	0.05	1.2	20	21	1.1	10	11	—	5,389	5,389	0.22	0.11	0.06	5,409
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.2	2.2	8.9	11	0.02	0.34	1.2	1.5	0.31	0.53	0.84	—	2,332	2,332	0.09	0.07	0.60	2,355
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	0.41	0.40	1.6	2.1	< 0.005	0.06	0.21	0.28	0.06	0.10	0.15	—	386	386	0.02	0.01	0.10	390
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## 2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.6	1.4	11	16	0.03	0.39	0.42	0.81	0.36	0.10	0.46	—	3,219	3,219	0.13	0.11	2.4	3,258
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.8	3.2	29	29	0.05	1.2	20	21	1.1	10	11	—	5,389	5,389	0.22	0.11	0.06	5,409
2027	38	38	10	15	0.03	0.34	0.42	0.77	0.32	0.10	0.42	—	3,168	3,168	0.12	0.11	0.05	3,204
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.3	1.1	8.9	11	0.02	0.34	1.2	1.5	0.31	0.53	0.84	—	2,332	2,332	0.09	0.07	0.60	2,355
2027	2.2	2.2	1.1	1.6	< 0.005	0.04	0.03	0.07	0.04	0.01	0.04	—	290	290	0.01	0.01	0.07	293
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.23	0.19	1.6	2.1	< 0.005	0.06	0.21	0.28	0.06	0.10	0.15	—	386	386	0.02	0.01	0.10	390
2027	0.41	0.40	0.19	0.28	< 0.005	0.01	0.01	0.01	0.01	< 0.005	0.01	—	48	48	< 0.005	< 0.005	0.01	49

## 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	16	15	11	94	0.21	0.28	17	18	0.27	4.4	4.7	133	25,312	25,446	15	1.1	65	26,213

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	14	13	13	72	0.19	0.27	17	18	0.26	4.4	4.7	133	23,537	23,670	15	1.2	2.0	24,398
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	12	11	9.1	57	0.15	0.23	12	13	0.22	3.2	3.4	133	18,731	18,864	14	0.89	20	19,511
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.1	2.0	1.7	10	0.03	0.04	2.3	2.3	0.04	0.58	0.62	22	3,101	3,123	2.4	0.15	3.4	3,230

## 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	11	11	10.0	86	0.20	0.17	17	18	0.16	4.4	4.6	—	20,604	20,604	0.76	0.96	64	20,974
Area	4.6	4.5	0.05	6.5	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27	27	< 0.005	< 0.005	—	27
Energy	0.14	0.07	1.3	1.1	0.01	0.10	—	0.10	0.10	—	0.10	—	4,535	4,535	0.35	0.03	—	4,553
Water	—	—	—	—	—	—	—	—	—	—	—	57	146	203	5.9	0.14	—	392
Waste	—	—	—	—	—	—	—	—	—	—	—	76	0.00	76	7.6	0.00	—	267
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.29	0.29
Total	16	15	11	94	0.21	0.28	17	18	0.27	4.4	4.7	133	25,312	25,446	15	1.1	65	26,213
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	10	9.4	11	71	0.18	0.17	17	18	0.16	4.4	4.6	—	18,855	18,855	0.86	1.0	1.7	19,186
Area	3.4	3.4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.14	0.07	1.3	1.1	0.01	0.10	—	0.10	0.10	—	0.10	—	4,535	4,535	0.35	0.03	—	4,553

Water	—	—	—	—	—	—	—	—	—	—	—	57	146	203	5.9	0.14	—	392
Waste	—	—	—	—	—	—	—	—	—	—	—	76	0.00	76	7.6	0.00	—	267
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.29	0.29
Total	14	13	13	72	0.19	0.27	17	18	0.26	4.4	4.7	133	23,537	23,670	15	1.2	2.0	24,398
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.5	6.9	7.8	53	0.14	0.12	12	13	0.12	3.2	3.3	—	14,036	14,036	0.59	0.72	20	14,286
Area	4.0	3.9	0.03	3.2	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13
Energy	0.14	0.07	1.3	1.1	0.01	0.10	—	0.10	0.10	—	0.10	—	4,535	4,535	0.35	0.03	—	4,553
Water	—	—	—	—	—	—	—	—	—	—	—	57	146	203	5.9	0.14	—	392
Waste	—	—	—	—	—	—	—	—	—	—	—	76	0.00	76	7.6	0.00	—	267
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.29	0.29
Total	12	11	9.1	57	0.15	0.23	12	13	0.22	3.2	3.4	133	18,731	18,864	14	0.89	20	19,511
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.4	1.3	1.4	9.6	0.03	0.02	2.3	2.3	0.02	0.58	0.60	—	2,324	2,324	0.10	0.12	3.3	2,365
Area	0.73	0.72	< 0.005	0.58	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.2	2.2	< 0.005	< 0.005	—	2.2
Energy	0.03	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02	—	751	751	0.06	< 0.005	—	754
Water	—	—	—	—	—	—	—	—	—	—	—	9.5	24	34	0.97	0.02	—	65
Waste	—	—	—	—	—	—	—	—	—	—	—	13	0.00	13	1.3	0.00	—	44
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Total	2.1	2.0	1.7	10	0.03	0.04	2.3	2.3	0.04	0.58	0.62	22	3,101	3,123	2.4	0.15	3.4	3,230

### 3. Construction Emissions Details

#### 3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.7	2.3	21	19	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.1	1.0	< 0.005	0.05	—	0.05	0.04	—	0.04	—	188	188	0.01	< 0.005	—	188
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.21	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	31	31	< 0.005	< 0.005	—	31
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.05	0.52	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	78	78	0.01	< 0.005	0.01	80
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.5	4.5	< 0.005	< 0.005	0.01	4.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.74	0.74	< 0.005	< 0.005	< 0.005	0.75
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.3. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.7	3.1	29	29	0.05	1.2	—	1.2	1.1	—	1.1	—	5,298	5,298	0.21	0.04	—	5,316

Dust From Material Movement	—	—	—	—	—	—	20	20	—	10	10	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.09	0.80	0.79	< 0.005	0.03	—	0.03	0.03	—	0.03	—	145	145	0.01	< 0.005	—	146
Dust From Material Movement	—	—	—	—	—	—	0.54	0.54	—	0.28	0.28	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.15	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24	24	< 0.005	< 0.005	—	24
Dust From Material Movement	—	—	—	—	—	—	0.10	0.10	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.06	0.60	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	91	91	0.01	< 0.005	0.01	93

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.6	2.6	< 0.005	< 0.005	< 0.005	2.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.43	0.43	< 0.005	< 0.005	< 0.005	0.44
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.5. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.0	1.6	15	17	0.03	0.65	—	0.65	0.59	—	0.59	—	2,960	2,960	0.12	0.02	—	2,970
Dust From Material Movement	—	—	—	—	—	—	7.1	7.1	—	3.4	3.4	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.82	0.96	< 0.005	0.04	—	0.04	0.03	—	0.03	—	162	162	0.01	< 0.005	—	163
Dust From Material Movement	—	—	—	—	—	—	0.39	0.39	—	0.19	0.19	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.15	0.17	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27	27	< 0.005	< 0.005	—	27
Dust From Material Movement	—	—	—	—	—	—	0.07	0.07	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.05	0.52	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	78	78	0.01	< 0.005	0.01	80
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.5	4.5	< 0.005	< 0.005	0.01	4.5

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.74	0.74	< 0.005	< 0.005	< 0.005	0.75	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.7. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.3	1.1	9.9	13	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.3	1.1	9.9	13	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.73	0.61	5.6	7.4	0.01	0.22	—	0.22	0.20	—	0.20	—	1,370	1,370	0.06	0.01	—	1,375
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	1.0	1.4	< 0.005	0.04	—	0.04	0.04	—	0.04	—	227	227	0.01	< 0.005	—	228
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.27	0.26	0.14	2.3	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	306	306	0.02	0.01	1.1	312
Vendor	0.03	0.02	0.71	0.26	< 0.005	0.01	0.14	0.15	0.01	0.04	0.05	—	516	516	0.01	0.08	1.3	541
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.22	0.18	1.8	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	271	271	0.02	0.01	0.03	276
Vendor	0.03	0.02	0.76	0.27	< 0.005	0.01	0.14	0.15	0.01	0.04	0.05	—	516	516	0.01	0.08	0.03	540
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.13	0.09	1.1	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	161	161	0.01	0.01	0.27	164
Vendor	0.02	0.01	0.42	0.15	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03	—	295	295	0.01	0.04	0.31	309
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.02	0.19	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	27	27	< 0.005	< 0.005	0.04	27

Vendor	< 0.005	< 0.005	0.08	0.03	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	< 0.005	—	49	49	< 0.005	0.01	0.05	51
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.9. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	1.0	9.4	13	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.57	0.78	< 0.005	0.02	—	0.02	0.02	—	0.02	—	145	145	0.01	< 0.005	—	146
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.10	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	24	24	< 0.005	< 0.005	—	24
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.21	0.16	1.6	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	266	266	0.01	0.01	0.03	270
Vendor	0.03	0.02	0.72	0.26	< 0.005	0.01	0.14	0.15	0.01	0.04	0.05	—	506	506	0.01	0.08	0.03	529
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	17	17	< 0.005	< 0.005	0.03	17
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	31	31	< 0.005	< 0.005	0.03	32
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.8	2.8	< 0.005	< 0.005	< 0.005	2.8
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.1	5.1	< 0.005	< 0.005	< 0.005	5.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.11. Paving (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.88	0.74	6.9	10.0	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.30	0.30	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.38	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	83	83	< 0.005	< 0.005	—	83
Paving	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14	14	< 0.005	< 0.005	—	14
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.05	0.47	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	77	77	< 0.005	< 0.005	0.01	78
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.4	4.4	< 0.005	< 0.005	0.01	4.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.72	0.72	< 0.005	< 0.005	< 0.005	0.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.13. Architectural Coating (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.83	1.1	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	38	38	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.3	7.3	< 0.005	< 0.005	—	7.3

Architect Coatings	2.1	2.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.2	1.2	< 0.005	< 0.005	—	1.2	
Architectural Coatings	0.38	0.38	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.33	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	53	53	< 0.005	< 0.005	0.01	54	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.0	3.0	< 0.005	< 0.005	< 0.005	3.1	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.50	0.50	< 0.005	< 0.005	< 0.005	0.51	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	10	9.8	9.3	80	0.19	0.16	16	16	0.15	4.1	4.3	—	19,142	19,142	0.71	0.89	60	19,485
Junior College (2yr)	0.54	0.50	0.48	4.1	0.01	0.01	0.84	0.84	0.01	0.21	0.22	—	985	985	0.04	0.05	3.1	1,003
Unrefrigerated Warehouse-No Rail	0.26	0.24	0.23	2.0	< 0.005	< 0.005	0.41	0.41	< 0.005	0.10	0.11	—	478	478	0.02	0.02	1.5	486
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	11	11	10.0	86	0.20	0.17	17	18	0.16	4.4	4.6	—	20,604	20,604	0.76	0.96	64	20,974
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Govern Office Building	9.5	8.7	11	66	0.17	0.16	16	16	0.15	4.1	4.3	—	17,517	17,517	0.80	0.96	1.6	17,824
Junior College (2yr)	0.49	0.45	0.55	3.4	0.01	0.01	0.84	0.84	0.01	0.21	0.22	—	901	901	0.04	0.05	0.08	917
Unrefrigerated Warehouse-No Rail	0.24	0.22	0.26	1.6	< 0.005	< 0.005	0.41	0.41	< 0.005	0.10	0.11	—	437	437	0.02	0.02	0.04	445
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	10	9.4	11	71	0.18	0.17	17	18	0.16	4.4	4.6	—	18,855	18,855	0.86	1.0	1.7	19,186
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Governent Office Building	1.2	1.2	1.3	8.8	0.02	0.02	2.1	2.1	0.02	0.53	0.55	—	2,127	2,127	0.09	0.11	3.1	2,165
Junior College (2yr)	0.07	0.07	0.08	0.51	< 0.005	< 0.005	0.12	0.12	< 0.005	0.03	0.03	—	123	123	0.01	0.01	0.18	125
Unrefrigerated Warehouse-No Rail	0.04	0.04	0.05	0.31	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	74	74	< 0.005	< 0.005	0.11	76
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.4	1.3	1.4	9.6	0.03	0.02	2.3	2.3	0.02	0.58	0.60	—	2,324	2,324	0.10	0.12	3.3	2,365

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	—	2,588	2,588	0.19	0.02	—	2,600
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	—	80	80	0.01	< 0.005	—	81
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	232	232	0.02	< 0.005	—	233
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	87	87	0.01	< 0.005	—	88
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,988	2,988	0.22	0.03	—	3,001

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	—	2,588	2,588	0.19	0.02	—	2,600
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	—	80	80	0.01	< 0.005	—	81
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	232	232	0.02	< 0.005	—	233
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	87	87	0.01	< 0.005	—	88
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,988	2,988	0.22	0.03	—	3,001
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	—	428	428	0.03	< 0.005	—	430
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	—	13	13	< 0.005	< 0.005	—	13
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	38	38	< 0.005	< 0.005	—	39

Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	14	14	< 0.005	< 0.005	—	15
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	495	495	0.04	< 0.005	—	497

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	0.12	0.06	1.1	0.90	0.01	0.08	—	0.08	0.08	—	0.08	—	1,272	1,272	0.11	< 0.005	—	1,276
Junior College (2yr)	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	89	89	0.01	< 0.005	—	89
Unrefrigerated Warehouse-No Rail	0.02	0.01	0.16	0.13	< 0.005	0.01	—	0.01	0.01	—	0.01	—	186	186	0.02	< 0.005	—	187
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.14	0.07	1.3	1.1	0.01	0.10	—	0.10	0.10	—	0.10	—	1,547	1,547	0.14	< 0.005	—	1,552
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	0.12	0.06	1.1	0.90	0.01	0.08	—	0.08	0.08	—	0.08	—	1,272	1,272	0.11	< 0.005	—	1,276
Junior College (2yr)	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	89	89	0.01	< 0.005	—	89
Unrefrigerated Warehouse-No Rail	0.02	0.01	0.16	0.13	< 0.005	0.01	—	0.01	0.01	—	0.01	—	186	186	0.02	< 0.005	—	187
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.14	0.07	1.3	1.1	0.01	0.10	—	0.10	0.10	—	0.10	—	1,547	1,547	0.14	< 0.005	—	1,552
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	211	211	0.02	< 0.005	—	211
Junior College (2yr)	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15	15	< 0.005	< 0.005	—	15

Unrefrigerated	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	31	31	< 0.005	< 0.005	—	31
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02	—	256	256	0.02	< 0.005	—	257

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	3.2	3.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.21	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.2	1.1	0.05	6.5	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27	27	< 0.005	< 0.005	—	27
Total	4.6	4.5	0.05	6.5	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27	27	< 0.005	< 0.005	—	27

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	3.2	3.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.21	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	3.4	3.4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.59	0.59	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.10	0.10	< 0.005	0.58	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.2	2.2	< 0.005	< 0.005	—	2.2
Total	0.73	0.72	< 0.005	0.58	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.2	2.2	< 0.005	< 0.005	—	2.2

#### 4.4. Water Emissions by Land Use

##### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Govern Office Building	—	—	—	—	—	—	—	—	—	—	—	41	105	146	4.2	0.10	—	282
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	0.58	1.5	2.1	0.06	< 0.005	—	4.0
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	16	40	55	1.6	0.04	—	106
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	57	146	203	5.9	0.14	—	392
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	41	105	146	4.2	0.10	—	282
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	0.58	1.5	2.1	0.06	< 0.005	—	4.0
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	16	40	55	1.6	0.04	—	106
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	57	146	203	5.9	0.14	—	392
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	6.8	17	24	0.70	0.02	—	47
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	0.10	0.25	0.34	0.01	< 0.005	—	0.66
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	2.6	6.6	9.1	0.26	0.01	—	18
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	9.5	24	34	0.97	0.02	—	65

## 4.5. Waste Emissions by Land Use

### 4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	54	0.00	54	5.4	0.00	—	189
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	4.3	0.00	4.3	0.43	0.00	—	15
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	18	0.00	18	1.8	0.00	—	62
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	76	0.00	76	7.6	0.00	—	267
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	54	0.00	54	5.4	0.00	—	189
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	4.3	0.00	4.3	0.43	0.00	—	15

Unrefrig erated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	18	0.00	18	1.8	0.00	—	62
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	76	0.00	76	7.6	0.00	—	267
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	9.0	0.00	9.0	0.90	0.00	—	31
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	0.72	0.00	0.72	0.07	0.00	—	2.5
Unrefrig erated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	2.9	0.00	2.9	0.29	0.00	—	10
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	13	0.00	13	1.3	0.00	—	44

## 4.6. Refrigerant Emissions by Land Use

## 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.26	0.26
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.29	0.29
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.26	0.26
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.29	0.29
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
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#### 4.7. Offroad Emissions By Equipment Type

##### 4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.8. Stationary Emissions By Equipment Type

##### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.9. User Defined Emissions By Equipment Type

##### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.10. Soil Carbon Accumulation By Vegetation Type

##### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetati on	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2026	1/29/2026	5.0	20	—
Site Preparation	Site Preparation	1/30/2026	2/13/2026	5.0	10.0	—
Grading	Grading	2/14/2026	3/14/2026	5.0	20	—
Building Construction	Building Construction	3/15/2026	1/31/2027	5.0	230	—
Paving	Paving	2/1/2027	3/1/2027	5.0	20	—
Architectural Coating	Architectural Coating	3/2/2027	3/30/2027	5.0	20	—

### 5.2. Off-Road Equipment

#### 5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.0	33	0.73
Demolition	Excavators	Diesel	Average	3.0	8.0	36	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.0	8.0	367	0.40
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.0	8.0	367	0.40
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	4.0	8.0	84	0.37
Grading	Excavators	Diesel	Average	1.00	8.0	36	0.38
Grading	Graders	Diesel	Average	1.00	8.0	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.0	367	0.40
Grading	Tractors/Loaders/Back hoes	Diesel	Average	3.0	8.0	84	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.0	367	0.29
Building Construction	Forklifts	Diesel	Average	3.0	8.0	82	0.20

Building Construction	Generator Sets	Diesel	Average	1.00	8.0	14	0.74
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	3.0	7.0	84	0.37
Building Construction	Welders	Diesel	Average	1.00	8.0	46	0.45
Paving	Pavers	Diesel	Average	2.0	8.0	81	0.42
Paving	Paving Equipment	Diesel	Average	2.0	8.0	89	0.36
Paving	Rollers	Diesel	Average	2.0	8.0	36	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.0	37	0.48

## 5.3. Construction Vehicles

### 5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Worker	15	7.7	LDA,LDT1,LDT2
Demolition	Vendor	—	6.8	HHDT,MHDT
Demolition	Hauling	0.00	20	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	Worker	18	7.7	LDA,LDT1,LDT2
Site Preparation	Vendor	—	6.8	HHDT,MHDT
Site Preparation	Hauling	0.00	20	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	15	7.7	LDA,LDT1,LDT2
Grading	Vendor	—	6.8	HHDT,MHDT
Grading	Hauling	0.00	20	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	52	7.7	LDA,LDT1,LDT2
Building Construction	Vendor	24	6.8	HHDT,MHDT
Building Construction	Hauling	0.00	20	HHDT
Building Construction	Onsite truck	—	—	HHDT

Paving	Worker	15	7.7	LDA,LDT1,LDT2
Paving	Vendor	—	6.8	HHDT,MHDT
Paving	Hauling	0.00	20	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	10	7.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	6.8	HHDT,MHDT
Architectural Coating	Hauling	0.00	20	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

## 5.4. Vehicles

### 5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

## 5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	223,800	74,600	14,016

## 5.6. Dust Mitigation

### 5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	—	0.00
Site Preparation	—	—	15	0.00	0.00
Grading	—	—	20	0.00	0.00
Paving	0.00	0.00	0.00	0.00	5.4

### 5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

## 5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Government Office Building	0.00	0%
Paving	Junior College (2yr)	0.00	0%
Paving	Unrefrigerated Warehouse-No Rail	0.00	0%
Paving	Other Non-Asphalt Surfaces	2.3	0%
Paving	Parking Lot	1.8	100%
Paving	Other Non-Asphalt Surfaces	0.77	0%
Paving	Other Asphalt Surfaces	0.46	100%

## 5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	453	0.03	< 0.005
2027	0.00	453	0.03	< 0.005

## 5.9. Operational Mobile Sources

### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VM/Weekday	VM/Saturday	VM/Sunday	VM/Year
Government Office Building	2,440	0.00	0.00	636,070	22,867	0.00	0.00	5,961,848
Junior College (2yr)	126	70	7.5	36,754	1,177	653	70	344,497
Unrefrigerated Warehouse-No Rail	61	61	61	22,229	571	571	571	208,346
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

## 5.10. Operational Area Sources

### 5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Government Office Building	Wood Fireplaces	0	0
Government Office Building	Gas Fireplaces	0	0
Government Office Building	Propane Fireplaces	0	0
Government Office Building	Electric Fireplaces	0	0
Government Office Building	No Fireplaces	0	0
Government Office Building	Conventional Wood Stoves	0	0
Government Office Building	Catalytic Wood Stoves	0	0
Government Office Building	Non-Catalytic Wood Stoves	0	0
Government Office Building	Pellet Wood Stoves	0	0
Junior College (2yr)	Wood Fireplaces	0	0
Junior College (2yr)	Gas Fireplaces	0	0
Junior College (2yr)	Propane Fireplaces	0	0
Junior College (2yr)	Electric Fireplaces	0	0
Junior College (2yr)	No Fireplaces	0	0
Junior College (2yr)	Conventional Wood Stoves	0	0
Junior College (2yr)	Catalytic Wood Stoves	0	0
Junior College (2yr)	Non-Catalytic Wood Stoves	0	0
Junior College (2yr)	Pellet Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Wood Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	Gas Fireplaces	0	0

Unrefrigerated Warehouse-No Rail	Propane Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	Electric Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	No Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	Conventional Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Catalytic Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Non-Catalytic Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Pellet Wood Stoves	0	0
Other Non-Asphalt Surfaces	Wood Fireplaces	0	0
Other Non-Asphalt Surfaces	Gas Fireplaces	0	0
Other Non-Asphalt Surfaces	Propane Fireplaces	0	0
Other Non-Asphalt Surfaces	Electric Fireplaces	0	0
Other Non-Asphalt Surfaces	No Fireplaces	0	0
Other Non-Asphalt Surfaces	Conventional Wood Stoves	0	0
Other Non-Asphalt Surfaces	Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Pellet Wood Stoves	0	0
Parking Lot	Wood Fireplaces	0	0
Parking Lot	Gas Fireplaces	0	0
Parking Lot	Propane Fireplaces	0	0
Parking Lot	Electric Fireplaces	0	0
Parking Lot	No Fireplaces	0	0
Parking Lot	Conventional Wood Stoves	0	0
Parking Lot	Catalytic Wood Stoves	0	0
Parking Lot	Non-Catalytic Wood Stoves	0	0
Parking Lot	Pellet Wood Stoves	0	0
Other Non-Asphalt Surfaces	Wood Fireplaces	0	0
Other Non-Asphalt Surfaces	Gas Fireplaces	0	0
Other Non-Asphalt Surfaces	Propane Fireplaces	0	0

Other Non-Asphalt Surfaces	Electric Fireplaces	0	0
Other Non-Asphalt Surfaces	No Fireplaces	0	0
Other Non-Asphalt Surfaces	Conventional Wood Stoves	0	0
Other Non-Asphalt Surfaces	Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Pellet Wood Stoves	0	0
Other Asphalt Surfaces	Wood Fireplaces	0	0
Other Asphalt Surfaces	Gas Fireplaces	0	0
Other Asphalt Surfaces	Propane Fireplaces	0	0
Other Asphalt Surfaces	Electric Fireplaces	0	0
Other Asphalt Surfaces	No Fireplaces	0	0
Other Asphalt Surfaces	Conventional Wood Stoves	0	0
Other Asphalt Surfaces	Catalytic Wood Stoves	0	0
Other Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0
Other Asphalt Surfaces	Pellet Wood Stoves	0	0

### 5.10.2. Architectural Coatings

—	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
undefined	0.00	0.00	223,800	74,600	14,016

### 5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

### 5.11. Operational Energy Consumption

## 5.11.1. Unmitigated

## Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Government Office Building	2,084,306	453	0.0330	0.0040	3,968,973
Junior College (2yr)	64,808	453	0.0330	0.0040	277,206
Unrefrigerated Warehouse-No Rail	187,044	453	0.0330	0.0040	581,580
Other Non-Asphalt Surfaces	0.00	453	0.0330	0.0040	0.00
Parking Lot	70,255	453	0.0330	0.0040	0.00
Other Non-Asphalt Surfaces	0.00	453	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	453	0.0330	0.0040	0.00

## 5.12. Operational Water and Wastewater Consumption

## 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Government Office Building	21,455,246	0.00
Junior College (2yr)	304,104	0.00
Unrefrigerated Warehouse-No Rail	8,093,750	0.00
Other Non-Asphalt Surfaces	0.00	0.00
Parking Lot	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00
Other Asphalt Surfaces	0.00	0.00

## 5.13. Operational Waste Generation

## 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
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Government Office Building	100	0.00
Junior College (2yr)	8.1	0.00
Unrefrigerated Warehouse-No Rail	33	0.00
Other Non-Asphalt Surfaces	0.00	0.00
Parking Lot	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00
Other Asphalt Surfaces	0.00	0.00

## 5.14. Operational Refrigeration and Air Conditioning Equipment

### 5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Government Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
Government Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.0	4.0	18
Junior College (2yr)	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
Junior College (2yr)	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.0	4.0	18
Junior College (2yr)	Stand-alone retail refrigerators and freezers	R-134a	1,430	< 0.005	1.00	0.00	1.00
Junior College (2yr)	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.5	7.5	20

## 5.15. Operational Off-Road Equipment

### 5.15.1. Unmitigated

## 5.16. Stationary Sources

### 5.16.1. Emergency Generators and Fire Pumps

### 5.16.2. Process Boilers

## 5.17. User Defined

## 5.18. Vegetation

### 5.18.1. Land Use Change

#### 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
--------------------------	----------------------	---------------	-------------

#### 5.18.1. Biomass Cover Type

##### 5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
--------------------	---------------	-------------

### 5.18.2. Sequestration

#### 5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
-----------	--------	------------------------------	------------------------------

## 6. Climate Risk Detailed Report

### 6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	36	annual days of extreme heat
Extreme Precipitation	1.3	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about  $\frac{3}{4}$  an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

## 6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	5	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	0	0	0	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

## 6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	5	1	1	4
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	1	1	1	2
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

## 6.4. Climate Risk Reduction Measures

# 7. Health and Equity Details

## 7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	89
AQ-PM	98
AQ-DPM	44
Drinking Water	68
Lead Risk Housing	21

Pesticides	90
Toxic Releases	68
Traffic	31
Effect Indicators	—
CleanUp Sites	32
Groundwater	71
Haz Waste Facilities/Generators	62
Impaired Water Bodies	12
Solid Waste	36
Sensitive Population	—
Asthma	47
Cardio-vascular	54
Low Birth Weights	38
Socioeconomic Factor Indicators	—
Education	49
Housing	8.5
Linguistic	8.5
Poverty	60
Unemployment	67

## 7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	54.27948159
Employed	86.78301039
Median HI	46.70858463
Education	—

Bachelor's or higher	50.28872065
High school enrollment	17.31040678
Preschool enrollment	17.29757475
Transportation	—
Auto Access	69.12613884
Active commuting	2.24560503
Social	—
2-parent households	52.58565379
Voting	71.60272039
Neighborhood	—
Alcohol availability	58.44989093
Park access	19.90247658
Retail density	23.36712434
Supermarket access	40.27973823
Tree canopy	17.1435904
Housing	—
Homeownership	62.86410882
Housing habitability	68.20223277
Low-inc homeowner severe housing cost burden	76.65853972
Low-inc renter severe housing cost burden	42.61516746
Uncrowded housing	57.46182471
Health Outcomes	—
Insured adults	65.30219428
Arthritis	38.0
Asthma ER Admissions	41.2
High Blood Pressure	43.5
Cancer (excluding skin)	29.3
Asthma	43.1

Coronary Heart Disease	43.7
Chronic Obstructive Pulmonary Disease	40.0
Diagnosed Diabetes	65.9
Life Expectancy at Birth	27.8
Cognitively Disabled	16.7
Physically Disabled	22.7
Heart Attack ER Admissions	53.6
Mental Health Not Good	48.5
Chronic Kidney Disease	55.3
Obesity	36.0
Pedestrian Injuries	58.4
Physical Health Not Good	51.8
Stroke	45.2
Health Risk Behaviors	—
Binge Drinking	30.9
Current Smoker	52.6
No Leisure Time for Physical Activity	50.7
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	36.4
Elderly	42.6
English Speaking	73.5
Foreign-born	17.6
Outdoor Workers	29.6
Climate Change Adaptive Capacity	—
Impervious Surface Cover	62.2
Traffic Density	45.5

Traffic Access	0.0
Other Indices	—
Hardship	44.2
Other Decision Support	—
2016 Voting	62.3

### 7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	60
Healthy Places Index Score for Project Location (b)	49
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

### 7.4. Health & Equity Measures

No Health & Equity Measures selected.

### 7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

### 7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

## 8. User Changes to Default Data

### 8.1. Justifications

**ATTACHMENT 3 - HRA RESULTS**



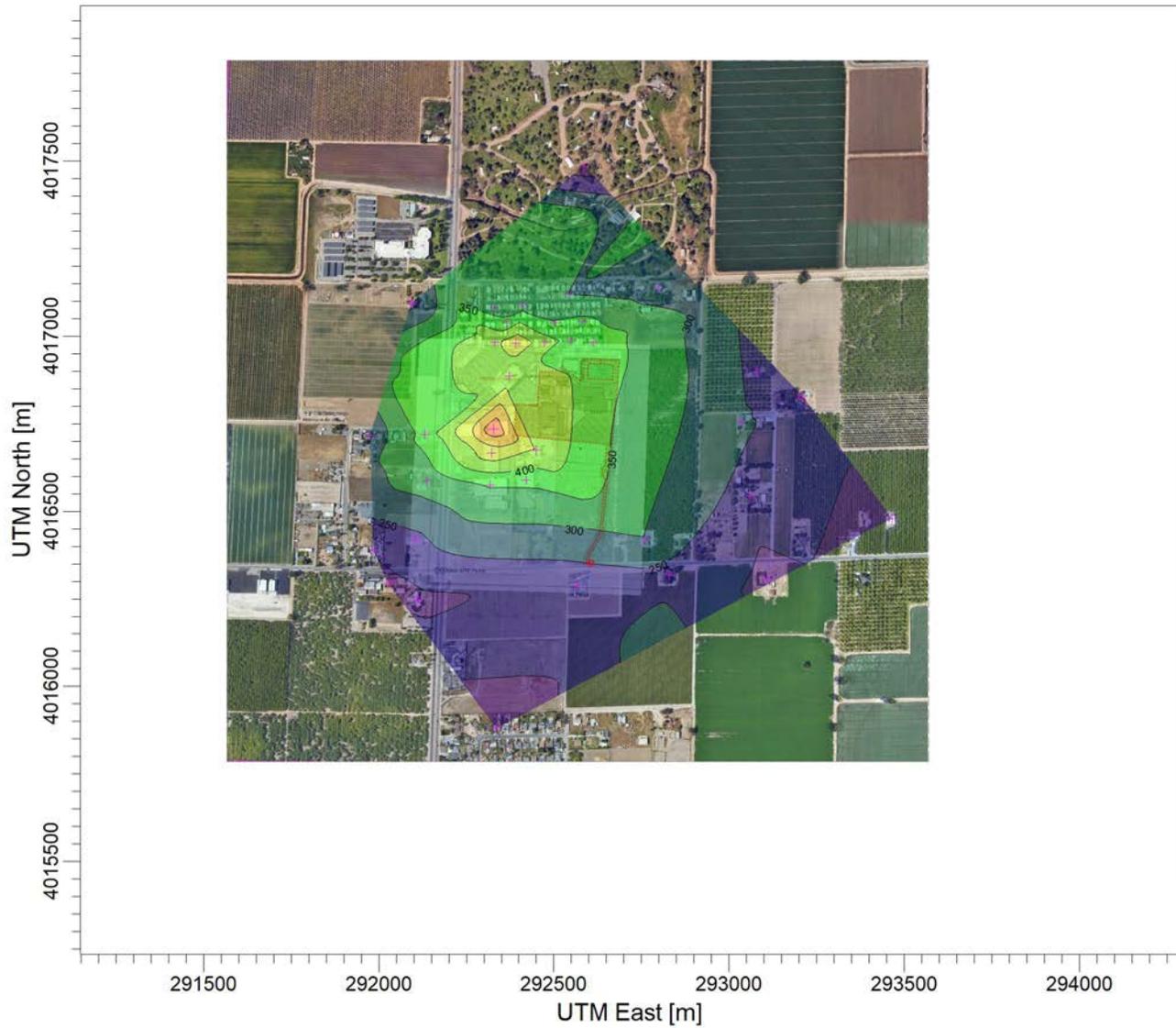
Core Environmental Consulting

Clovis, CA 93612  
(559) 202-3941

PROJECT NAME	DATE	SCALE	<b>RECEPTOR MAP</b>
TCOE ACC	12/1/25	NOT TO SCALE	
PROJECT NUMBER	DRAWN BY	LAT/LONG	
<b>25017</b>	<b>JM</b>	<b>36.273752, -119.309346</b>	

PROJECT TITLE:

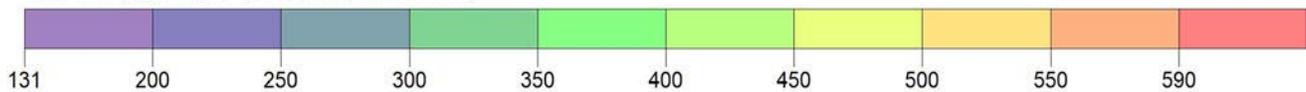
C:\Lakes\AERMOD View\25017 - TCOE ACC HRA\25017 - TCOE ACC HRA.isc



PLOT FILE OF HIGH 1ST HIGH 1-HR VALUES FOR SOURCE GROUP: PAREA1

ug/m<sup>3</sup>

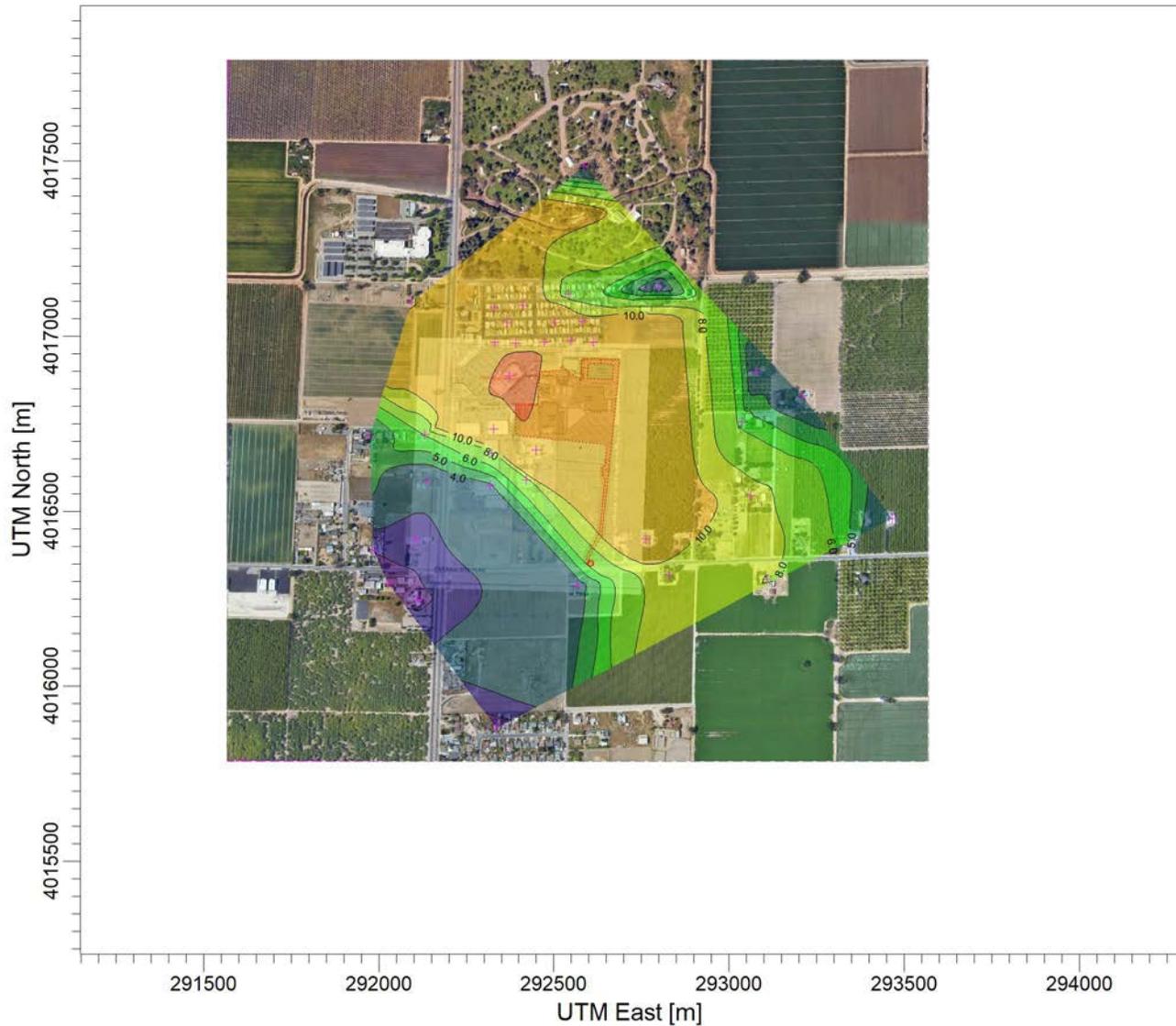
Max: 590 [ug/m<sup>3</sup>] at (292328.02, 4016735.15)



COMMENTS:	SOURCES: <b>1</b>	COMPANY NAME:	
	RECEPTORS: <b>37</b>	MODELER:	
	OUTPUT TYPE: <b>Concentration</b>	SCALE: 1:19,693 0  0.5 km	
	MAX: <b>590 ug/m<sup>3</sup></b>	DATE: <b>12/2/2025</b>	PROJECT NO.:

PROJECT TITLE:

C:\Lakes\AERMOD View\25017 - TCOE ACC HRA\25017 - TCOE ACC HRA.isc



PLOT FILE OF PERIOD VALUES AVERAGED ACROSS 0 YEARS FOR SOURCE GROUP: PARE1

ug/m<sup>3</sup>

Max: 39.4 [ug/m<sup>3</sup>] at (292372.83, 4016885.40)



COMMENTS:	SOURCES: <b>1</b>	COMPANY NAME:	
	RECEPTORS: <b>37</b>	MODELER:	
	OUTPUT TYPE: <b>Concentration</b>	SCALE: 1:19,693 0  0.5 km	
	MAX: <b>39.4 ug/m<sup>3</sup></b>	DATE: <b>12/2/2025</b>	PROJECT NO.:

\*\*HARP - Air Dispersion Modeling and Risk Tool v22118

\*\*12/2/2025

\*\*Exported Risk Results

REC	X	Y	RISK_SUM	SCENARIO	INHAL_RISK
1	292612.9	4016982	1.06E-05	2YrCancerDerived_Inh	1.06E-05
2	292546.9	4016987	1.32E-05	2YrCancerDerived_Inh	1.32E-05
3	292473.2	4016983	1.56E-05	2YrCancerDerived_Inh	1.56E-05
4	292502.4	4017038	8.84E-06	2YrCancerDerived_Inh	8.84E-06
5	292582.4	4017042	6.53E-06	2YrCancerDerived_Inh	6.53E-06
6	292390.7	4016980	1.57E-05	2YrCancerDerived_Inh	1.57E-05
7	292331	4016982	1.35E-05	2YrCancerDerived_Inh	1.35E-05
8	292366.6	4017038	1.03E-05	2YrCancerDerived_Inh	1.03E-05
9	292328.5	4017081	7.84E-06	2YrCancerDerived_Inh	7.84E-06
10	292411	4017088	7.19E-06	2YrCancerDerived_Inh	7.19E-06
11	292540.5	4017119	4.19E-06	2YrCancerDerived_Inh	4.19E-06
12	292799.3	4017140	1.69E-06	2YrCancerDerived_Inh	1.69E-06
13	293079.8	4016898	1.29E-06	2YrCancerDerived_Inh	1.29E-06
14	293035.5	4016757	3.32E-06	2YrCancerDerived_Inh	3.32E-06
15	293060.9	4016544	5.22E-06	2YrCancerDerived_Inh	5.22E-06
16	292763.4	4016421	8.47E-06	2YrCancerDerived_Inh	8.47E-06
17	292565.1	4016290	1.99E-06	2YrCancerDerived_Inh	1.99E-06
18	292829.4	4016317	5.43E-06	2YrCancerDerived_Inh	5.43E-06
19	292336.4	4015880	3.50E-07	2YrCancerDerived_Inh	3.50E-07
20	293107	4016306	4.69E-06	2YrCancerDerived_Inh	4.69E-06
21	293464.3	4016480	1.59E-06	2YrCancerDerived_Inh	1.59E-06
22	293209	4016829	1.29E-06	2YrCancerDerived_Inh	1.29E-06
23	292586.3	4017485	8.90E-07	2YrCancerDerived_Inh	8.90E-07
24	292093.4	4017096	5.41E-06	2YrCancerDerived_Inh	5.41E-06
25	292130.3	4016719	3.58E-06	2YrCancerDerived_Inh	3.58E-06
26	291974.8	4016717	2.31E-06	2YrCancerDerived_Inh	2.31E-06
27	291985.3	4016387	5.97E-07	2YrCancerDerived_Inh	5.97E-07
28	<del>292373</del>	<del>4016885</del>	<del>2.33E-05</del>	<del>2YrCancerDerived_Inh</del>	<del>2.33E-05</del> Resident value
28	292372.8	4016885	3.52E-07	2YrCancerDerived_Inh	3.52E-07 Worker value
29	292328	4016735	1.01E-05	2YrCancerDerived_Inh	1.01E-05
30	292322.7	4016667	4.29E-06	2YrCancerDerived_Inh	4.29E-06
31	292317.5	4016574	2.26E-06	2YrCancerDerived_Inh	2.26E-06
32	292449.3	4016675	1.56E-05	2YrCancerDerived_Inh	1.56E-05
33	292420.3	4016590	4.36E-06	2YrCancerDerived_Inh	4.36E-06
34	292138.2	4016588	1.56E-06	2YrCancerDerived_Inh	1.56E-06
35	292104	4016419	7.65E-07	2YrCancerDerived_Inh	7.65E-07
36	292111.9	4016248	4.22E-07	2YrCancerDerived_Inh	4.22E-07

\*\*HARP - Air Dispersion Modeling and Risk Tool v22118

\*\*12/2/2025

\*\*Exported Risk Results

REC	X	Y	SCENARIO	RESP	MAXHI	
1	292612.9	4016982	NonCancerChronicDerived_Inh	0.006183	0.006183	
2	292546.9	4016987	NonCancerChronicDerived_Inh	0.007694	0.007694	
3	292473.2	4016983	NonCancerChronicDerived_Inh	0.009095	0.009095	
4	292502.4	4017038	NonCancerChronicDerived_Inh	0.005169	0.005169	
5	292582.4	4017042	NonCancerChronicDerived_Inh	0.003816	0.003816	
6	292390.7	4016980	NonCancerChronicDerived_Inh	0.009165	0.009165	
7	292331	4016982	NonCancerChronicDerived_Inh	0.007895	0.007895	
8	292366.6	4017038	NonCancerChronicDerived_Inh	0.006008	0.006008	
9	292328.5	4017081	NonCancerChronicDerived_Inh	0.004583	0.004583	
10	292411	4017088	NonCancerChronicDerived_Inh	0.004203	0.004203	
11	292540.5	4017119	NonCancerChronicDerived_Inh	0.00245	0.00245	
12	292799.3	4017140	NonCancerChronicDerived_Inh	0.000991	0.000991	
13	293079.8	4016898	NonCancerChronicDerived_Inh	0.000755	0.000755	
14	293035.5	4016757	NonCancerChronicDerived_Inh	0.00194	0.00194	
15	293060.9	4016544	NonCancerChronicDerived_Inh	0.003054	0.003054	
16	292763.4	4016421	NonCancerChronicDerived_Inh	0.004951	0.004951	
17	292565.1	4016290	NonCancerChronicDerived_Inh	0.001161	0.001161	
18	292829.4	4016317	NonCancerChronicDerived_Inh	0.003177	0.003177	
19	292336.4	4015880	NonCancerChronicDerived_Inh	0.000205	0.000205	
20	293107	4016306	NonCancerChronicDerived_Inh	0.002744	0.002744	
21	293464.3	4016480	NonCancerChronicDerived_Inh	0.00093	0.00093	
22	293209	4016829	NonCancerChronicDerived_Inh	0.000756	0.000756	
23	292586.3	4017485	NonCancerChronicDerived_Inh	0.00052	0.00052	
24	292093.4	4017096	NonCancerChronicDerived_Inh	0.003166	0.003166	
25	292130.3	4016719	NonCancerChronicDerived_Inh	0.002093	0.002093	
26	291974.8	4016717	NonCancerChronicDerived_Inh	0.00135	0.00135	
27	291985.3	4016387	NonCancerChronicDerived_Inh	0.000349	0.000349	
28	292373	4016885	NonCancerChronicDerived_Inh	0.01362	0.01362	Resident Value
28	292372.8	4016885	NonCancerChronicDerived_Inh	0.013617	0.013617	Worker Value
29	292328	4016735	NonCancerChronicDerived_Inh	0.005905	0.005905	
30	292322.7	4016667	NonCancerChronicDerived_Inh	0.002508	0.002508	
31	292317.5	4016574	NonCancerChronicDerived_Inh	0.00132	0.00132	
32	292449.3	4016675	NonCancerChronicDerived_Inh	0.009102	0.009102	
33	292420.3	4016590	NonCancerChronicDerived_Inh	0.00255	0.00255	
34	292138.2	4016588	NonCancerChronicDerived_Inh	0.00091	0.00091	
35	292104	4016419	NonCancerChronicDerived_Inh	0.000447	0.000447	
36	292111.9	4016248	NonCancerChronicDerived_Inh	0.000247	0.000247	

HARP Project Summary Report 12/2/2025 4:11:33 PM

\*\*\*PROJECT INFORMATION\*\*\*

HARP Version: 22118  
 Project Name: 25017 - TCOE ACC HRA  
 Project Output Directory: C:\HARP2\Projects\25017 - TCOE ACC HRA  
 HARP Database: NA

\*\*\*FACILITY INFORMATION\*\*\*

Origin  
 X (m):0  
 Y (m):0  
 Zone:1  
 No. of Sources:0  
 No. of Buildings:0

\*\*\*EMISSION INVENTORY\*\*\*

No. of Pollutants:1  
 No. of Background Pollutants:0

Emissions

ScrID	StkID	ProID	PolID	PolAbbrev	
Multi	Annual Ems	MaxHr Ems	MWAF		
	(lbs/yr)	(lbs/hr)			
PAREA1	0	0	9901	DieselExhPM	1
	120	0	1		

Background

PolID	PolAbbrev	Conc (ug/m^3)	MWAF
-------	-----------	---------------	------

Ground level concentration files (\glc\)

9901MAXHR.txt  
 9901PER.txt

\*\*\*POLLUTANT HEALTH INFORMATION\*\*\*

Health Database: C:\HARP2\Tables\HEALTH17320.mdb  
 Health Table Version: HEALTH22013  
 Official: True

PolID	PolAbbrev	InhCancer	OralCancer	AcuteREL
InhChronicREL	OralChronicREL	InhChronic8HRREL		
9901	DieselExhPM	1.1		5

\*\*\*AIR DISPERSION MODELING INFORMATION\*\*\*

Versions used in HARP. All executables were obtained from USEPA's Support Center for Regulatory Atmospheric Modeling website (<http://www.epa.gov/scram001/>)

AERMOD: 18081  
AERMAP: 18081  
BPIPPRM: 04274  
AERPLOT: 13329

\*\*\*METEOROLOGICAL INFORMATION\*\*\*

Version:  
Surface File:  
Profile File:  
Surface Station:  
Upper Station:  
On-Site Station:

\*\*\*LIST OF AIR DISPERSION FILES\*\*\*

AERMOD Input File:  
AERMOD Output File:  
AERMOD Error File:  
Plotfile list

---

\*\*\*LIST OF RISK ASSESSMENT FILES\*\*\*

Health risk analysis files (\hra\)

---

ConstructionCancerRisk.csv  
ConstructionCancerRiskSumByRec.csv  
ConstructionGLCLList.csv  
ConstructionHRAInput.hra  
ConstructionNCAcuteRisk.csv  
ConstructionNCAcuteRiskSumByRec.csv  
ConstructionNCChronicRisk.csv  
ConstructionNCChronicRiskSumByRec.csv  
ConstructionOutput.txt  
ConstructionPathwayRec.csv  
ConstructionPolDB.csv  
ResidentCancerRisk.csv  
ResidentCancerRiskSumByRec.csv  
ResidentGLCLList.csv  
ResidentHRAInput.hra  
ResidentNCAcuteRisk.csv  
ResidentNCAcuteRiskSumByRec.csv  
ResidentNCChronicRisk.csv  
ResidentNCChronicRiskSumByRec.csv  
ResidentOutput.txt  
ResidentPathwayRec.csv  
ResidentPolDB.csv  
WorkerCancerRisk.csv

WorkerCancerRiskSumByRec.csv  
WorkerGLCList.csv  
WorkerHRAInput.hra  
WorkerNCAcuteRisk.csv  
WorkerNCAcuteRiskSumByRec.csv  
WorkerNCChronicRisk.csv  
WorkerNCChronicRiskSumByRec.csv  
WorkerOutput.txt  
WorkerPathwayRec.csv  
WorkerPolDB.csv

Spatial averaging files (\sa\)

---

HARP Project Summary Report 12/2/2025 4:13:40 PM

\*\*\*PROJECT INFORMATION\*\*\*

HARP Version: 22118  
 Project Name: 25017 - TCOE ACC HRA  
 Project Output Directory: C:\HARP2\Projects\25017 - TCOE ACC HRA  
 HARP Database: NA

\*\*\*FACILITY INFORMATION\*\*\*

Origin  
 X (m):0  
 Y (m):0  
 Zone:1  
 No. of Sources:0  
 No. of Buildings:0

\*\*\*EMISSION INVENTORY\*\*\*

No. of Pollutants:1  
 No. of Background Pollutants:0

Emissions

ScrID	StkID	ProID	PolID	PolAbbrev	
Multi	Annual Ems	MaxHr Ems	MWAF		
	(lbs/yr)	(lbs/hr)			
PAREA1	0	0	9901	DieselExhPM	1
	120	0	1		

Background

PolID	PolAbbrev	Conc (ug/m^3)	MWAF
-------	-----------	---------------	------

Ground level concentration files (\glc\)

9901MAXHR.txt  
 9901PER.txt

\*\*\*POLLUTANT HEALTH INFORMATION\*\*\*

Health Database: C:\HARP2\Tables\HEALTH17320.mdb  
 Health Table Version: HEALTH22013  
 Official: True

PolID	PolAbbrev	InhCancer	OralCancer	AcuteREL
InhChronicREL	OralChronicREL	InhChronic8HRREL		
9901	DieselExhPM	1.1		5

\*\*\*AIR DISPERSION MODELING INFORMATION\*\*\*

Versions used in HARP. All executables were obtained from USEPA's Support Center for Regulatory Atmospheric Modeling website (<http://www.epa.gov/scram001/>)

AERMOD: 18081  
AERMAP: 18081  
BPIPPRM: 04274  
AERPLOT: 13329

\*\*\*METEOROLOGICAL INFORMATION\*\*\*

Version:  
Surface File:  
Profile File:  
Surface Station:  
Upper Station:  
On-Site Station:

\*\*\*LIST OF AIR DISPERSION FILES\*\*\*

AERMOD Input File:  
AERMOD Output File:  
AERMOD Error File:  
Plotfile list

---

\*\*\*LIST OF RISK ASSESSMENT FILES\*\*\*

Health risk analysis files (\hra\)

---

ConstructionCancerRisk.csv  
ConstructionCancerRiskSumByRec.csv  
ConstructionGLCLList.csv  
ConstructionHRAInput.hra  
ConstructionNCAcuteRisk.csv  
ConstructionNCAcuteRiskSumByRec.csv  
ConstructionNCChronicRisk.csv  
ConstructionNCChronicRiskSumByRec.csv  
ConstructionOutput.txt  
ConstructionPathwayRec.csv  
ConstructionPolDB.csv  
ResidentCancerRisk.csv  
ResidentCancerRiskSumByRec.csv  
ResidentGLCLList.csv  
ResidentHRAInput.hra  
ResidentNCAcuteRisk.csv  
ResidentNCAcuteRiskSumByRec.csv  
ResidentNCChronicRisk.csv  
ResidentNCChronicRiskSumByRec.csv  
ResidentOutput.txt  
ResidentPathwayRec.csv  
ResidentPolDB.csv  
WorkerCancerRisk.csv

WorkerCancerRiskSumByRec.csv  
WorkerGLCList.csv  
WorkerHRAInput.hra  
WorkerNCAcuteRisk.csv  
WorkerNCAcuteRiskSumByRec.csv  
WorkerNCChronicRisk.csv  
WorkerNCChronicRiskSumByRec.csv  
WorkerOutput.txt  
WorkerPathwayRec.csv  
WorkerPolDB.csv

Spatial averaging files (\sa\)

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# TECHNICAL MEMORANDUM

Jesse Madsen  
Owner, Principal Scientist  
3560 Argyle Avenue, Clovis, CA 93612  
[Jesse@CoreEnvironmentalConsulting.com](mailto:Jesse@CoreEnvironmentalConsulting.com)  
(559) 202-3941

Hector Guerra  
4Creeks, Inc.  
324 S. Santa Fe Street, Suite A  
Visalia, CA 93292

December 2, 2025

Subject: **Technical Memorandum – Air Quality, Greenhouse Gas, and Health Risk Assessment for Tulare County Office of Education Administration and Conference Center Expansion**

This Technical Memorandum (memo) has been prepared to summarize the methodology and results of an Air Quality (AQ), Greenhouse Gas (GHG), and Health Risk Assessment (HRA) for the Tulare County Office of Education (TCOE) Administration and Conference Center Expansion project (Project). TCOE proposes to expand and add facilities to its existing Administrative Office and Conference Center (AOCC) site at 6200 South Mooney Boulevard in Tulare County near Visalia, California.

The Project is subject to the California Environmental Quality Act (CEQA) and an Initial Study is in progress. This Technical Memo focuses on the quantification of criteria pollutants, health risks to sensitive receptors from toxic air contaminants (TAC), and greenhouse gas (GHG) emissions. Criteria pollutant emissions and health risks from TAC are also compared to numerical thresholds of significance established by the San Joaquin Valley Air Pollution Control District (SJVAPCD). GHG emissions, Vehicle Miles Traveled (VMT), and energy usage calculations from the California Emissions Estimator Model (CalEEMod) are included for information purposes as no related numerical thresholds of significance have been established.

This Technical Memo does not include in-depth discussions on se@ng, regulatory background, pollutant descriptions and sources, other impacts, or final determinations of impact significance. Appropriate discussions on all topics not included in this Technical Memo, including the full range of considerations for impact significance, should be included in the Initial Study. Among other considerations, the Initial Study should include assessments for consistency with established plans and regulations for the control of air quality and GHG.

Estimated criteria pollutant emissions and health risks from TAC would not exceed the SJVAPCD thresholds of significance. Therefore, the associated impacts would be **less than significant**, with regards to the numerical thresholds discussed.

## Project Description

TCOE proposes to expand and add facilities to its existing Administrative Office and Conference Center (AOCC) site at 6200 South Mooney Boulevard. TCOE has also acquired and mostly developed an adjacent parcel that will be merged with the main Project site to form a single parcel for development.

The main Project site is approximately 12.5 acres and would include:

- 108,000 square feet (sqB) of office and conference room space
- 3 classrooms, with a training kitchen, totaling 6,200 sqB
- 35,000 sqB of warehouse space

- Stormwater basin, parking, vehicular access, and other site improvements

The primary use of the Project will be to host professional development trainings and workshops for TCOE employees.

In addition to the expansion, TCOE previously completed construction of an Administration and Conference Center on an adjacent 11-acre parcel. An Initial Study and Mitigated Negative Declaration (IS/MND) was completed for the previous project, which included 87,000 square feet of building space, consisting of a three-story office building, a conference center, and associated parking and site improvements. The existing conference center is used to host conferences and educational training.

The existing site would be merged with the Project for planning purposes, and the combined development parcel would be annexed into the City of Visalia. Except for the minor site work shown on the attached Demolition Plan, the existing site is not included in the analyses performed for this Tech Memo because an IS/MND was previously completed and there would be no changes to operational characteristics.

Project construction will commence after all permits and bidding have been completed. To allow for the earliest (and most health-conservative for an AQ/GHG/HRA analysis) start date, construction was assumed to begin January 1, 2026 and last for the default duration estimated by CalEEMod.

#### Criteria Pollutants

Criteria pollutant emissions were estimated using the latest version of CalEEMod. Land uses were modeled as follows:

- Conference room – government office building
- Classrooms – junior community college
- Warehouse – unrefrigerated warehouse, no rail
- Parking – parking lot
- Driveways – other asphalt areas
- Stormwater basin, concrete – other non-asphalt area

The operational characteristics of the uses selected for the conference room, classrooms, and warehouse would overestimate the actual vehicle trips and resource usages of the Project, but were selected as health-conservative options that most closely match based on the CalEEMod User Guide. Areas were estimated from the attached Site Plan.

The CalEEMod results are included as Attachment 2 and summarized in the table below, along with comparisons to the SJVAPCD thresholds of significance.

**Table 1 Criteria Pollutant Emissions Compared to SJVAPCD Thresholds of Significance (tons per year)**

CONSTRUCTION	CO	NOx	ROG	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction Emissions (mitigated, worst year)	2.1	1.6	0.40	<0.005	0.28	0.15
SJVAPCD Threshold of Significance	100	10	10	27	15	15
<b>Exceeds Threshold?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
OPERATION	CO	NOx	ROG	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Operational Emissions	10	1.7	2.0	0.03	2.3	0.62
SJVAPCD Threshold of Significance	100	10	10	27	15	15
<b>Exceeds Threshold?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
CO = carbon monoxide NOx = oxides of nitrogen ROG = reactive organic gases SO <sub>x</sub> = oxides of sulfur; sulfur dioxide (SO <sub>2</sub> ) is the primary constituent and essentially equivalent PM <sub>10</sub> = particulate matter with an aerodynamic diameter less than 10 microns PM <sub>2.5</sub> = particulate matter with an aerodynamic diameter less than 2.5 microns						

As shown in the table above, Project construction and operational emissions of criteria pollutants not exceed SJVAPCD thresholds of significance. Therefore, with respect to the numerical thresholds, impacts would be **less than significant**.

As explained in the introduction of this Technical Memo, the Initial Study must include additional considerations including, but not limited to, an assessment of Project consistency with established air quality plans and regulations. The broader discussion of impact significance is deferred to the Initial Study; however, it is noted here that, generally, Projects with emissions below the SJVAPCD thresholds of significance and that comply with SJVAPCD air quality plans and regulations can be presumed to have a less-than-significant individual and cumulative impact to air quality.

It should be noted that emissions were estimated without including any non-default regulatory or mitigation measures (except for Mitigation Measure HRA-1). Emissions are therefore expected to be lower with implementation of all State, regional, and local measures. Some of the impact measures include clean vehicle and fuel regulations, the California Green Building Standards Code (CalGreen), anti-idling, SJVAPCD Regulation VIII (Fugitive PM<sub>10</sub> Prohibitions), and SJVAPCD Rule 9510 (Indirect Source Review).

**Ambient Air Quality**

The exposure of sensitive receptors to substantial pollutant concentrations can occur if the Project would result in localized exceedances of National or California Ambient Air Quality Standards (NAAQS/CAAQS), or if Project emissions of Toxic Air Contaminants (TAC) would exceed SJVAPCD thresholds of significance (discussed in the HRA section below). SJVAPCD has determined that, if maximum Project criteria pollutant emissions are below 100 pounds per day for each pollutant, it can be concluded that the Project would not result in a localized exceedance of NAAQS or CAAQS and no further Ambient Air Quality Analysis (AAQA) is required.

Following the SJVAPCD methodology presented in Application Review Policies (APR) 2030 (Project Ambient Air Quality Analysis Applicability Determination under CEQA)<sup>1</sup>, the Project was first assessed to determine whether it would be subject to Indirect Source Review (ISR). The Project site is over the square footage thresholds listed in Rule 9510 and would therefore be subject. Maximum daily criteria pollutants resulting from construction and operation were then calculated as described in the Criteria Pollutants section above.

<sup>1</sup> (San Joaquin Valley Air Pollution Control District , 2018)

Maximum daily criteria pollutant emissions are compared to the 100-lb-per-day AAQA applicability threshold in the table below.

**Table 2 Maximum Daily Criteria Pollutant Emissions Compared to AAQA Screening Threshold (lb/day)**

CONSTRUCTION	CO	NOx	ROG	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction Emissions (max daily, worst year, worst season)	29	29	38	0.05	21	11
<b>Exceeds 100 lb/day?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
OPERATION	CO	NOx	ROG	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Operational Emissions (max daily, worst season)	94	13	15	0.21	18	4.7
<b>Exceeds 100 lb/day?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
CO = carbon monoxide NOx = oxides of nitrogen ROG = reactive organic gases SOx = oxides of sulfur; sulfur dioxide (SO <sub>2</sub> ) is the primary constituent and essentially equivalent PM <sub>10</sub> = particulate matter with an aerodynamic diameter less than 10 microns PM <sub>2.5</sub> = particulate matter with an aerodynamic diameter less than 2.5 microns						

It is worth noting that, although the worst daily operational CO emissions are estimated to come near the 100 pound per day threshold, the emissions are an overestimation compared to actual operational characteristics and, more important, an AAQA is only required to consider on-site emissions and off-site emissions within ¼ mile of the project boundary. Since most of the emissions are from vehicle trips, with trip lengths averaging over 9 miles, the onsite CO emissions for consideration under an AAQA would be far lower.

As shown in the table above, none of the criteria pollutants would exceed 100 pounds per day, during construction or operation. Therefore, no further AAQA is required and the Project would not expose sensitive receptors to substantial pollutant concentrations by resulting in a localized exceedance of NAAQS or CAAQS. With respect to the numerical threshold established by SJVAPCD, the associated impact would be **less than significant**. No mitigation is required outside of compliance with existing regulations. As discussed in the Criteria Pollutants section above, emissions are expected to be further reduced with implementation of all State, regional, and local measures.

**Health Risk Assessment**

The Health Risk Assessment (HRA) in this Technical Memo was prepared in accordance with the guidelines outlined in the Office of Environmental Health Hazard Assessment (OEHHA) *Guidance Manual for Preparation of Health Risk Assessments*<sup>2</sup>; SJVAPCD Policy APR 1906 – *Framework for Performing Health Risk Assessments*<sup>3</sup> and *Guidance for Air Dispersion Modeling*<sup>4</sup>. The reader is encouraged to reference those sources, along with the SJVAPCD *Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI)*<sup>5</sup> for in-depth discussions regarding se@ng, regulatory background, pollutant descriptions, and HRA methodologies, as this Technical Memo includes only a critical summary of the project-specific HRA methodology and results.

The primary Toxic Air Contaminants (TAC) of concern include diesel particulate matter (DPM) emissions from diesel-fueled construction vehicle and equipment use. Operation would not include any substantial sources of DPM or any other substantial sources of TAC.

<sup>2</sup> (Office of Environmental Health Hazard Assessment, 2015)  
<sup>3</sup> (San Joaquin Valley Air Pollution Control District, 2020)  
<sup>4</sup> (San Joaquin Valley Air Pollution Control District, 2022a)  
<sup>5</sup> (San Joaquin Valley Air Pollution Control District, 2015)

The United States Environmental Protection Agency’s (U.S. EPA) *American Meteorological Society/EPA Regulatory Model* (AERMOD) air dispersion model was used to model the annual downwind air concentration at nearby receptors, based on a normalized emission rate of one gram per second. Meteorological data was obtained from SJVAPCD (Visalia met site); CARB and SJVAPCD recommended modeling parameters were used throughout. Construction emissions were modeled as an area source with dimensions matching the Project site. Discrete worker and residential receptors were added based on business and residence locations shown on the imported Google Earth base map; a total of 36 receptors were added for a representative analysis. Terrain was added using the built in WebGIS tool.

Construction DPM emissions were estimated using CalEEMod, as described in the Criteria Pollutants section above. SJVAPCD considers PM<sub>10</sub> exhaust to be a reasonable surrogate for DPM, and the maximum (worst year) annual emissions were used for subsequent calculations.

Normalized downwind air concentrations for each receptor (modeled in the step above) were imported into the CARB Hotspots Analysis and Reporting Program (HARP2) *Air Dispersion Modeling and Risk Tool* (ADMRT) and combined with the toxic emissions data to estimate the ground level concentrations of TAC at each receptor. A separate run was performed for worker risk because the highest risk receptor would be at the existing TCOE facilities just west of the site. The exposure duration was set to two years, rounded up from the 1.3 year construction timeline. The construction risk calculations included the area source described in the modeling above and annual emissions of DPM. OEHHA has not established a Reference Exposure Level (REL) for 8-hour chronic, or acute health risk from DPM. Thus, the 8-hour chronic and acute HI are not calculated, except in unusual situations such as when a sensitive receptor is located directly above the emission release point (e.g., on a hillside or in a multistory apartment building).

Results of the AERMOD modeling and ADMRT calculations are included as Attachment 3, along with a map of receptors. Modeling input and output files will be made available to reviewing agencies upon request. The highest risks calculated for each scenario are presented in the table below, along with comparisons to SJVAPCD thresholds of significance. All results are the maximally exposed individual (MEI) for each scenario.

**Table 3 Health Risk Assessment Results Compared to Thresholds of Significance**

RISK	CARCINOGEN (risk in one million)	CHRONIC HAZARD INDEX
Construction Health Risk	15.7 (Receptor 6)	0.0092 (Receptor 6)
Thresholds of Significance	20	1
<b>Exceeds Threshold?</b>	<b>NO</b>	<b>NO</b>

<sup>1</sup>No HI calculated for Construction DPM Acute risk because OEHHA has not established REL.

As shown in the table above, the highest risks occurred at Receptor 6, a residence located adjacent to the north side of the Project site. Initial calculations indicated that the highest risks could occur at Receptor 28; however, that receptor location is an existing TCOE facility adjacent to the west side of the Project site. Risks were recalculated for Receptor 28 as a worker and the results were substantially lower than the risks to residential Receptor 6 and well under the SJVAPCD thresholds of significance.

Calculated risks would not exceed SJVAPCD thresholds of significance. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations resulting from TAC emissions. Impacts would be **less than significant**.

As discussed in the Criteria Pollutants section above, emissions would be further reduced with implementation of all State, regional, and local measures.

**Greenhouse Gases, Vehicle Miles Travelled, and Energy Use**

Greenhouse Gases (GHG), Vehicle Miles Travelled (VMT), and Energy use were all estimated using CalEEMod, as described in the Criteria Pollutants section above. The full detailed report is included in Attachment 2 CalEEMod Results. Summaries are provided in the tables below for information purposes only. No discussion is provided in this Technical Memo regarding impact significance. As discussed in the Criteria Pollutants section above, emissions are expected to be even lower with implementation of all State, regional, and local measures.

**Table 4 Project Greenhouse Gas Emissions (metric tons per year)**

CONSTRUCTION	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Construction Emissions (worst year)	---	339	339	0.01	0.01	0.04	342
OPERATION	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Operational Emissions	18.7	5,035	5,054	2.35	0.42	741	5,979
<i>BCO2 = biogenic carbon dioxide</i> <i>NBCO2 = non-biogenic (anthropogenic) carbon dioxide</i> <i>CO2T = total carbon dioxide</i> <i>CH4 = methane</i> <i>N2O = nitrous oxide</i> <i>R = refrigerants</i> <i>CO2e = carbon dioxide equivalents (total)</i>							

**Table 5 Project Energy Use by Land Use**

LAND USE	ELECTRICITY (kWh/yr)	NATURAL GAS (kBTU/yr)
Government Office Building (Conference Center)	2,084,306	3,968,973
Junior College (Classrooms)	64,808	277,206
Unrefrigerated Warehouse – No Rail	187,044	581,580
Parking Lot	70,255	0
<b>TOTAL</b>	<b>2,406,413</b>	<b>4,827,759</b>
<i>kWh/yr = kilowatt-hours per year</i> <i>kBTU/yr = thousand British Thermal Units per year</i>		

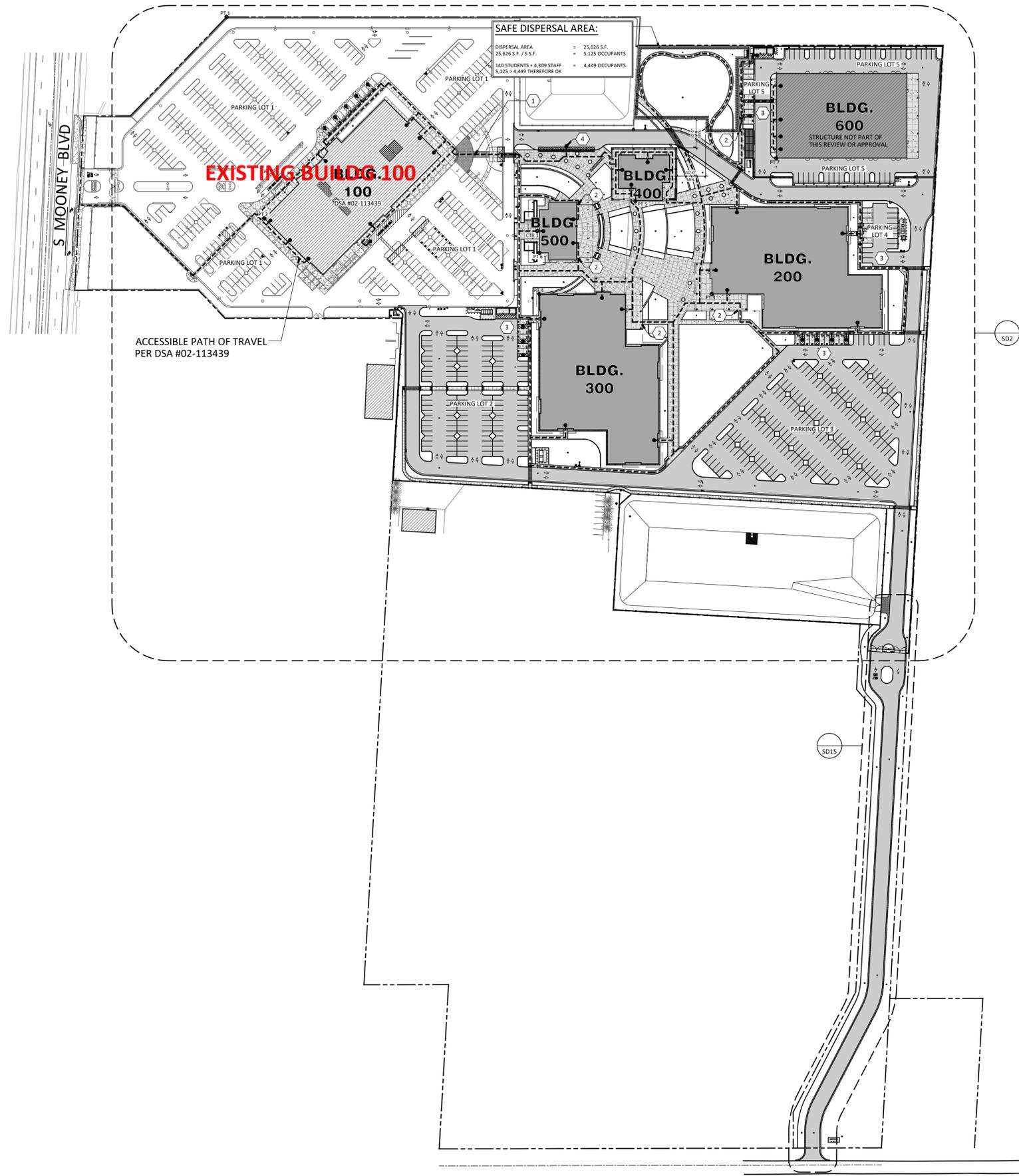
**Table 6 Project Operational Mobile Sources**

LAND USE	Trips/ Weekday	Trips/ Saturday	Trips/ Sunday	Trips/ Year	VMT/ Weekday	VMT/ Saturday	VMT/ Sunday	VMT/ Year
Government Office Building (Conference Center)	2,440	0	0	636,070	22,867	0	0	5,961,848
Junior College (Classrooms)	126	70	7.5	36,754	1,177	653	70	344,497
Unrefrigerated Warehouse – No Rail	61	61	61	22,229	571	571	571	208,346
<b>TOTAL</b>	<b>2,627</b>	<b>131</b>	<b>69</b>	<b>695,053</b>	<b>24,615</b>	<b>1,224</b>	<b>641</b>	<b>6,514,691</b>
<i>VMT = vehicle miles travelled</i>								

### References

- Association of Environmental Professionals. (2025). *2025 California Environmental Quality Act (CEQA) Statute and Guidelines*.
- California Air Pollution Control Officers Association. (2022). *California Emissions Estimator Model*. Retrieved from <https://caleemod.com/>.
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- San Joaquin Valley Air Pollution Control District. (2024). *APR 1925 - Policy for District Rule 2201 AAQA Modeling*. Retrieved from <https://ww2.valleyair.org/media/341fy4sn/apr-1925-rule-2201-aaqa-modeling-may-2024.pdf>.

**Attachments: Attachment 1 Site Plans; Attachment 2 CalEEMod Results; Attachment 3 HRA Results.**



**ATTACHMENT 1 - SITE PLANS**

**SITE PLAN LEGEND:**

- NEW BUILDING
- STRUCTURE NOT PART OF THIS REVIEW OR APPROVAL
- (E) BUILDING
- SAFE DISPERSAL AREA
- ACCESSIBLE RESTROOMS, SEE FLOOR PLANS FOR GENDER
- PROPERTY LINE
- ACCESSIBLE PATH OF TRAVEL
- NEW CONCRETE PAVING
- NEW ASPHALT PAVING
- CONTROL POINT, SEE TABLE ON SD2

**SITE PLAN KEYNOTES:**

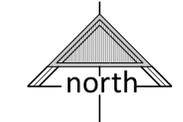
- 1 ACCESSIBLE PATH OF TRAVEL:**  
PATH OF TRAVEL (P.O.T.) AS VERIFIED BY THE ARCHITECT IS:  
- A COMMON BARRIER FREE ACCESSIBLE ROUTE AT LEAST 48" WIDE WITHOUT ANY ABRUPT VERTICAL CHANGES EXCEEDING 1/2" BEVELLED AT 1:2 MAXIMUM SLOPE, EXCEPT THAT LEVEL CHANGES DO NOT EXCEED 1/4" VERTICAL.  
- THE PATH SURFACE IS SLIP RESISTANT, STABLE, FIRM, AND SMOOTH.  
- PASSING SPACES AT LEAST 60" x 60" ARE LOCATED NOT MORE THAN 200' APART (11B-403.5.3).  
- CONTINUOUS GRADIENTS HAVE 60' LEVEL AREAS NOT MORE THAN 400' APART (11B-403.7).  
- CROSS-SLOPE DOES NOT EXCEED 2%.  
- SLOPE IN THE DIRECTION OF TRAVEL IS 5% OR LESS UNLESS OTHERWISE INDICATED AS A RAMP.  
- MAINTAIN P.O.T. FREE OF OVERHANGING OBSTRUCTIONS TO 80" MINIMUM, PROTRUDING OBJECTS GREATER THAN 4" PROJECTION FROM WALL OR EDGE AND 27" ABOVE FINISH GRADE (11B-307.2).  
- GRATING LOCATED IN THE SURFACE OF ANY PEDESTRIAN WAY IN THE P.O.T. SHALL HAVE GRID/OPENINGS IN GRATING LIMITED TO 1/2" MAXIMUM CLEAR IN THE DIRECTION OF TRAVEL FLOW
- 2 GATE ACCESS NOTE:**  
ALL C.L. AND DECORATIVE METAL 4'-0" WIDE GATES IN THE PATH OF TRAVEL SHALL HAVE LEVER-TYPE LATCH AND 10" HIGH KICKPLATES SECURE TO C.L. MESH BOTH SIDES, SLBS MAX FORCE TO PUSH OR PULL OPEN (11B-404.2.9) AND SLBS MAX TO ACTIVATE OPERABLE PARTS (11B-304.9) AND STRIKE SIDE (MANEUVERING) CLEARANCE PER CBC 11B-404.2.4.1.
- 3 ACCESSIBLE PARKING:**  
NEW ACCESSIBLE PARKING, SEE SHEET SD8  
PARKING LOT 1: 383 EXISTING PARKING STALLS PER DSA# 02-113439. 8 ACCESSIBLE PARKING STALLS REQUIRED. 7 ACCESSIBLE PARKING STALLS AND 2 ACCESSIBLE VAN STALLS PROVIDED, 9 > 8 THEREFORE OK.  
PARKING LOT 2: 122 PARKING STALLS PER THIS APPLICATION. 5 ACCESSIBLE PARKING STALLS REQUIRED. 3 ACCESSIBLE PARKING STALLS AND 2 ACCESSIBLE VAN STALLS PROVIDED, 5 = 5 THEREFORE OK.  
PARKING LOT 3: 200 PARKING STALLS PER THIS APPLICATION. 7 ACCESSIBLE PARKING STALLS REQUIRED. 3 ACCESSIBLE PARKING STALLS AND 4 ACCESSIBLE VAN STALLS PROVIDED, 7 > 7 THEREFORE OK.  
PARKING LOT 4: 17 PARKING STALLS PER THIS APPLICATION. 1 ACCESSIBLE PARKING STALL PROVIDED, 1 = 1 THEREFORE OK.  
PARKING LOT 5: 51 PARKING STALLS PER THIS APPLICATION. 3 ACCESSIBLE PARKING STALLS REQUIRED. 2 ACCESSIBLE PARKING STALLS AND 2 ACCESSIBLE VAN STALLS PROVIDED, 4 > 3 THEREFORE OK.
- 4 PASSENGER LOADING ZONES:**  
DROP-OFF ZONES SHALL PROVIDE AN ACCESS AISLE AT LEAST 60" WIDE AND 20' LONG ADJACENT AND PARALLEL TO THE VEHICLE PULL UP SPACE. SUCH ZONES SHALL BE LOCATED ON A SURFACE WITH A SLOPE NOT OVER 2%.

EV PARKING					
LOT #	# OF STALLS	EV CAPABLE REQ'D	# OF EV CAPABLE	EV CHARGERS REQ'D	# OF EV CHARGERS
2 + 3 + 4 (PUBLIC PARKING)	338	68	68	18	18
(FLEET PARKING)	50	10	48	3	48

REFER TO ENLARGED SITE PLANS, SHEETS SD4-SD7 FOR LOCATION OF EV CAPABLE STALLS AND EV CHARGERS.

**OVERALL SITE PLAN**

SCALE: 1" = 100'-0"



DATE: JANUARY 24, 2025

**NEW ADMINISTRATION FACILITY EXPANSION**  
TULARE COUNTY OFFICE OF EDUCATION  
VISALIA, TULARE COUNTY, CA

REVISIONS


**MANGINI** ARCHITECTURE  
INGENUITY  
www.mangini.us  
(559) 627.0530 Office  
(559) 627.1926 Fax  
MANGINI ASSOCIATES INC.  
4320 West Mineral King Avenue  
Visalia, California 93291

TITLE  
OVERALL SITE PLAN

**SD1**

PROJECT **23098**

**DEMO SITE PLAN LEGEND:**

-  (E) BUILDING
-  (E) CONCRETE TO BE DEMOLISHED
-  (E) ASPHALT TO BE DEMOLISHED
-  (E) OBJECT TO BE DEMOLISHED
-  (E) CHAIN LINK FENCE TO BE DEMOLISHED
-  (E) CHAIN LINK FENCE, PROTECT
-  (E) TREE TO BE REMOVED, FILL & COMPACT ALL HOLES LEFT BY REMOVAL OF ROOT-BALLS.
-  PROPERTY LINE
-  CONTROL POINT

**DEMO SITE PLAN KEYNOTES:**

-  D1 EXISTING CONCRETE CURB TO REMAIN
-  D2 EXISTING CONCRETE CURB & GUTTER TO REMAIN
-  D3 EXISTING CONCRETE PAVING TO REMAIN
-  D4 EXISTING ASPHALT PAVING TO REMAIN
-  D5 EXISTING TURF OR PLANTER TO REMAIN
-  D6 EXISTING TREE TO REMAIN
-  D7 EXISTING CHAIN LINK FENCE TO REMAIN
-  D8 EXISTING LIGHT POLE TO REMAIN
-  D9 EXISTING STORM DRAIN MANHOLE TO REMAIN
-  D10 EXISTING UTILITY BOX TO REMAIN
-  D11 EXISTING DRAIN INLET TO REMAIN
-  D12 REMOVE EXISTING CONCRETE CURB
-  D13 REMOVE EXISTING CONCRETE CURB & GUTTER
-  D14 REMOVE EXISTING CONCRETE PAVING
-  D15 REMOVE EXISTING RIVER ROCK
-  D16 REMOVE EXISTING PLANT/TREE
-  D17 REMOVE EXISTING CHAIN LINK FENCING/GATE
-  D18 REMOVE EXISTING LIGHT POLE
-  D19 REMOVE EXISTING CATCH BASIN, SEE CIVIL DWGS.
-  D20 EXISTING SHIPPING CONTAINER TO BE SALVAGED TO ADJACENT PROPERTY OWNER
-  D21 REMOVE EXISTING UNDERGROUND UTILITY LINE

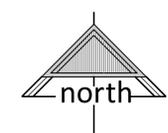
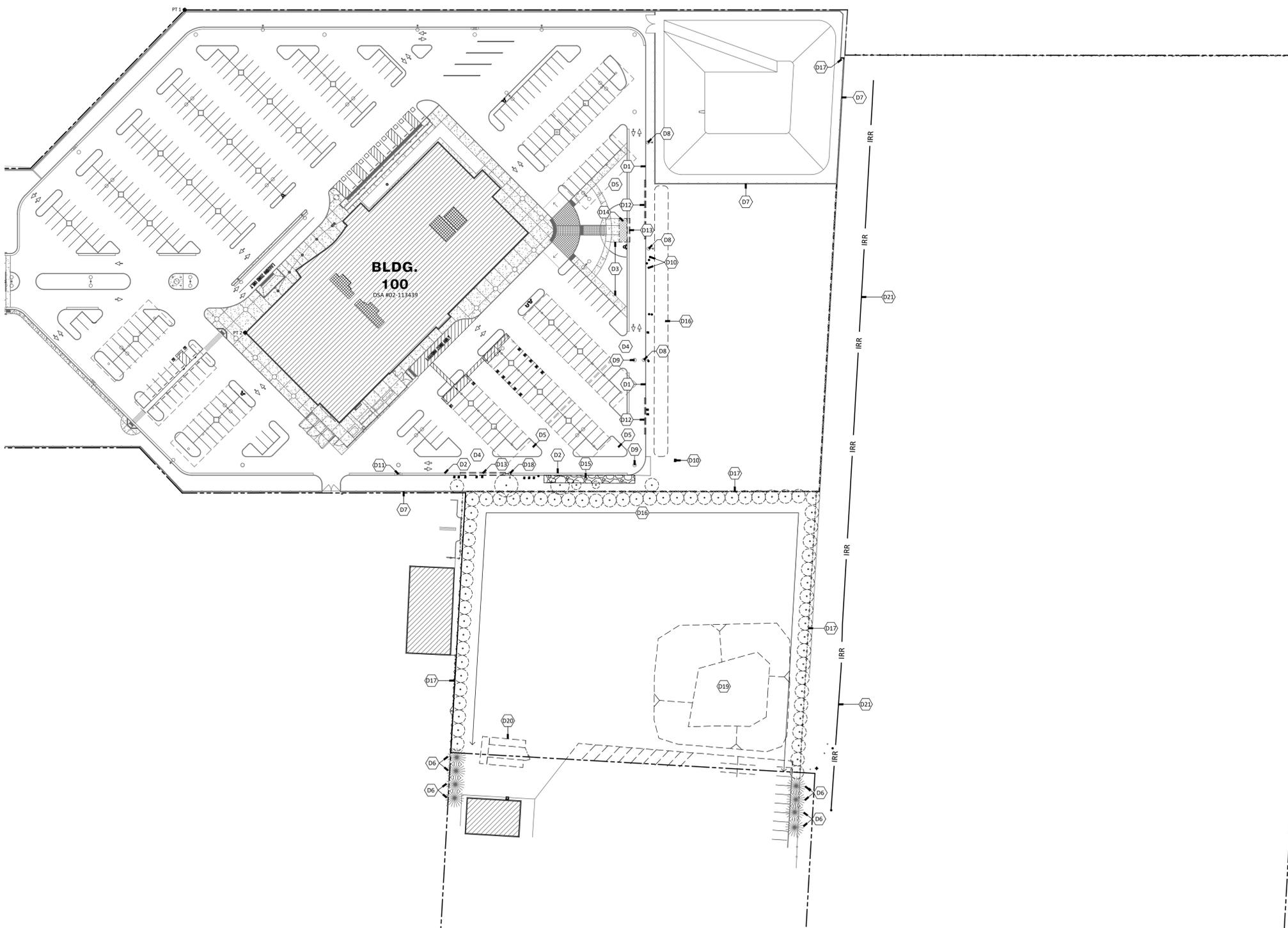
DATE: JANUARY 24, 2025

**NEW ADMINISTRATION  
 FACILITY EXPANSION**  
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 VISALIA, TULARE COUNTY, CA

REVISIONS

**MANGINI** ARCHITECTURE  
 INGENUITY  
 www.mangini.us  
 (559) 627.0530 Office  
 (559) 627.1926 Fax  
 MANGINI ASSOCIATES INC.  
 4320 West Mineral King Avenue  
 Visalia, California 93291

TITLE  
 DEMO  
 SITE PLAN  
**SD3**  
 PROJECT **23098**



**DEMO SITE PLAN**

SCALE: 1" = 60'-0"

# 25017 TCOE ACC (1st Run) Detailed Report

**ATTACHMENT 2 - CalEEMod  
Results**

## Table of Contents

1. Basic Project Information
  - 1.1. Basic Project Information
  - 1.2. Land Use Types
  - 1.3. User-Selected Emission Reduction Measures by Emissions Sector
2. Emissions Summary
  - 2.1. Construction Emissions Compared Against Thresholds
  - 2.2. Construction Emissions by Year, Unmitigated
  - 2.4. Operations Emissions Compared Against Thresholds
  - 2.5. Operations Emissions by Sector, Unmitigated
3. Construction Emissions Details
  - 3.1. Demolition (2026) - Unmitigated
  - 3.3. Site Preparation (2026) - Unmitigated
  - 3.5. Grading (2026) - Unmitigated
  - 3.7. Building Construction (2026) - Unmitigated
  - 3.9. Building Construction (2027) - Unmitigated

3.11. Paving (2027) - Unmitigated

3.13. Architectural Coating (2027) - Unmitigated

#### 4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

#### 4.8. Stationary Emissions By Equipment Type

##### 4.8.1. Unmitigated

#### 4.9. User Defined Emissions By Equipment Type

##### 4.9.1. Unmitigated

#### 4.10. Soil Carbon Accumulation By Vegetation Type

##### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

##### 4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

##### 4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

### 5. Activity Data

#### 5.1. Construction Schedule

#### 5.2. Off-Road Equipment

##### 5.2.1. Unmitigated

#### 5.3. Construction Vehicles

##### 5.3.1. Unmitigated

#### 5.4. Vehicles

##### 5.4.1. Construction Vehicle Control Strategies

#### 5.5. Architectural Coatings

#### 5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

## 7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

## 8. User Changes to Default Data

8.1. Justifications

# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	25017 TCOE ACC (1st Run)
Construction Start Date	1/1/2026
Operational Year	2028
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	1.9
Precipitation (days)	24
Location	11836 Avenue 264, Visalia, CA 93277, USA
County	Tulare
City	Unincorporated
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2784
EDFZ	9
Electric Utility	Eastside Power Authority
Gas Utility	Southern California Gas
App Version	2022.1.1.35

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Government Office Building	108	1000sqft	2.5	108,000	0.00	0.00	—	—

Junior College (2yr)	6.2	1000sqft	0.14	6,200	0.00	0.00	—	—
Unrefrigerated Warehouse-No Rail	35	1000sqft	0.80	35,000	0.00	0.00	—	—
Other Non-Asphalt Surfaces	100	1000sqft	2.3	0.00	0.00	0.00	—	—
Parking Lot	80	1000sqft	1.8	0.00	0.00	0.00	—	—
Other Non-Asphalt Surfaces	33	1000sqft	0.77	0.00	0.00	0.00	—	—
Other Asphalt Surfaces	20	1000sqft	0.46	0.00	0.00	0.00	—	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.6	1.4	11	16	0.03	0.39	0.42	0.81	0.36	0.10	0.46	—	3,219	3,219	0.13	0.11	2.4	3,258
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	38	38	29	29	0.05	1.2	20	21	1.1	10	11	—	5,389	5,389	0.22	0.11	0.06	5,409
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.2	2.2	8.9	11	0.02	0.34	1.2	1.5	0.31	0.53	0.84	—	2,332	2,332	0.09	0.07	0.60	2,355
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	0.41	0.40	1.6	2.1	< 0.005	0.06	0.21	0.28	0.06	0.10	0.15	—	386	386	0.02	0.01	0.10	390
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## 2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.6	1.4	11	16	0.03	0.39	0.42	0.81	0.36	0.10	0.46	—	3,219	3,219	0.13	0.11	2.4	3,258
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.8	3.2	29	29	0.05	1.2	20	21	1.1	10	11	—	5,389	5,389	0.22	0.11	0.06	5,409
2027	38	38	10	15	0.03	0.34	0.42	0.77	0.32	0.10	0.42	—	3,168	3,168	0.12	0.11	0.05	3,204
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.3	1.1	8.9	11	0.02	0.34	1.2	1.5	0.31	0.53	0.84	—	2,332	2,332	0.09	0.07	0.60	2,355
2027	2.2	2.2	1.1	1.6	< 0.005	0.04	0.03	0.07	0.04	0.01	0.04	—	290	290	0.01	0.01	0.07	293
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.23	0.19	1.6	2.1	< 0.005	0.06	0.21	0.28	0.06	0.10	0.15	—	386	386	0.02	0.01	0.10	390
2027	0.41	0.40	0.19	0.28	< 0.005	0.01	0.01	0.01	0.01	< 0.005	0.01	—	48	48	< 0.005	< 0.005	0.01	49

## 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	16	15	11	94	0.21	0.28	17	18	0.27	4.4	4.7	133	25,312	25,446	15	1.1	65	26,213

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	14	13	13	72	0.19	0.27	17	18	0.26	4.4	4.7	133	23,537	23,670	15	1.2	2.0	24,398
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	12	11	9.1	57	0.15	0.23	12	13	0.22	3.2	3.4	133	18,731	18,864	14	0.89	20	19,511
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.1	2.0	1.7	10	0.03	0.04	2.3	2.3	0.04	0.58	0.62	22	3,101	3,123	2.4	0.15	3.4	3,230

## 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	11	11	10.0	86	0.20	0.17	17	18	0.16	4.4	4.6	—	20,604	20,604	0.76	0.96	64	20,974
Area	4.6	4.5	0.05	6.5	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27	27	< 0.005	< 0.005	—	27
Energy	0.14	0.07	1.3	1.1	0.01	0.10	—	0.10	0.10	—	0.10	—	4,535	4,535	0.35	0.03	—	4,553
Water	—	—	—	—	—	—	—	—	—	—	—	57	146	203	5.9	0.14	—	392
Waste	—	—	—	—	—	—	—	—	—	—	—	76	0.00	76	7.6	0.00	—	267
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.29	0.29
Total	16	15	11	94	0.21	0.28	17	18	0.27	4.4	4.7	133	25,312	25,446	15	1.1	65	26,213
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	10	9.4	11	71	0.18	0.17	17	18	0.16	4.4	4.6	—	18,855	18,855	0.86	1.0	1.7	19,186
Area	3.4	3.4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.14	0.07	1.3	1.1	0.01	0.10	—	0.10	0.10	—	0.10	—	4,535	4,535	0.35	0.03	—	4,553

Water	—	—	—	—	—	—	—	—	—	—	—	57	146	203	5.9	0.14	—	392
Waste	—	—	—	—	—	—	—	—	—	—	—	76	0.00	76	7.6	0.00	—	267
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.29	0.29
Total	14	13	13	72	0.19	0.27	17	18	0.26	4.4	4.7	133	23,537	23,670	15	1.2	2.0	24,398
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.5	6.9	7.8	53	0.14	0.12	12	13	0.12	3.2	3.3	—	14,036	14,036	0.59	0.72	20	14,286
Area	4.0	3.9	0.03	3.2	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13
Energy	0.14	0.07	1.3	1.1	0.01	0.10	—	0.10	0.10	—	0.10	—	4,535	4,535	0.35	0.03	—	4,553
Water	—	—	—	—	—	—	—	—	—	—	—	57	146	203	5.9	0.14	—	392
Waste	—	—	—	—	—	—	—	—	—	—	—	76	0.00	76	7.6	0.00	—	267
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.29	0.29
Total	12	11	9.1	57	0.15	0.23	12	13	0.22	3.2	3.4	133	18,731	18,864	14	0.89	20	19,511
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.4	1.3	1.4	9.6	0.03	0.02	2.3	2.3	0.02	0.58	0.60	—	2,324	2,324	0.10	0.12	3.3	2,365
Area	0.73	0.72	< 0.005	0.58	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.2	2.2	< 0.005	< 0.005	—	2.2
Energy	0.03	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02	—	751	751	0.06	< 0.005	—	754
Water	—	—	—	—	—	—	—	—	—	—	—	9.5	24	34	0.97	0.02	—	65
Waste	—	—	—	—	—	—	—	—	—	—	—	13	0.00	13	1.3	0.00	—	44
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Total	2.1	2.0	1.7	10	0.03	0.04	2.3	2.3	0.04	0.58	0.62	22	3,101	3,123	2.4	0.15	3.4	3,230

### 3. Construction Emissions Details

#### 3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.7	2.3	21	19	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.1	1.0	< 0.005	0.05	—	0.05	0.04	—	0.04	—	188	188	0.01	< 0.005	—	188
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.21	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	31	31	< 0.005	< 0.005	—	31
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.05	0.52	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	78	78	0.01	< 0.005	0.01	80
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.5	4.5	< 0.005	< 0.005	0.01	4.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.74	0.74	< 0.005	< 0.005	< 0.005	0.75
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.3. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.7	3.1	29	29	0.05	1.2	—	1.2	1.1	—	1.1	—	5,298	5,298	0.21	0.04	—	5,316

Dust From Material Movement	—	—	—	—	—	—	20	20	—	10	10	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.09	0.80	0.79	< 0.005	0.03	—	0.03	0.03	—	0.03	—	145	145	0.01	< 0.005	—	146
Dust From Material Movement	—	—	—	—	—	—	0.54	0.54	—	0.28	0.28	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.15	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24	24	< 0.005	< 0.005	—	24
Dust From Material Movement	—	—	—	—	—	—	0.10	0.10	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.06	0.60	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	91	91	0.01	< 0.005	0.01	93

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.6	2.6	< 0.005	< 0.005	< 0.005	2.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.43	0.43	< 0.005	< 0.005	< 0.005	0.44
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.5. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.0	1.6	15	17	0.03	0.65	—	0.65	0.59	—	0.59	—	2,960	2,960	0.12	0.02	—	2,970
Dust From Material Movement	—	—	—	—	—	—	7.1	7.1	—	3.4	3.4	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.82	0.96	< 0.005	0.04	—	0.04	0.03	—	0.03	—	162	162	0.01	< 0.005	—	163
Dust From Material Movement	—	—	—	—	—	—	0.39	0.39	—	0.19	0.19	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.15	0.17	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27	27	< 0.005	< 0.005	—	27
Dust From Material Movement	—	—	—	—	—	—	0.07	0.07	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.05	0.52	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	78	78	0.01	< 0.005	0.01	80
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.5	4.5	< 0.005	< 0.005	0.01	4.5

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.74	0.74	< 0.005	< 0.005	< 0.005	0.75	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00

### 3.7. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.3	1.1	9.9	13	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.3	1.1	9.9	13	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.73	0.61	5.6	7.4	0.01	0.22	—	0.22	0.20	—	0.20	—	1,370	1,370	0.06	0.01	—	1,375
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	1.0	1.4	< 0.005	0.04	—	0.04	0.04	—	0.04	—	227	227	0.01	< 0.005	—	228
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.27	0.26	0.14	2.3	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	306	306	0.02	0.01	1.1	312
Vendor	0.03	0.02	0.71	0.26	< 0.005	0.01	0.14	0.15	0.01	0.04	0.05	—	516	516	0.01	0.08	1.3	541
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.22	0.18	1.8	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	271	271	0.02	0.01	0.03	276
Vendor	0.03	0.02	0.76	0.27	< 0.005	0.01	0.14	0.15	0.01	0.04	0.05	—	516	516	0.01	0.08	0.03	540
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.13	0.09	1.1	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	161	161	0.01	0.01	0.27	164
Vendor	0.02	0.01	0.42	0.15	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03	—	295	295	0.01	0.04	0.31	309
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.02	0.19	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	27	27	< 0.005	< 0.005	0.04	27

Vendor	< 0.005	< 0.005	0.08	0.03	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	< 0.005	—	49	49	< 0.005	0.01	0.05	51
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.9. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	1.0	9.4	13	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.57	0.78	< 0.005	0.02	—	0.02	0.02	—	0.02	—	145	145	0.01	< 0.005	—	146
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.10	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	24	24	< 0.005	< 0.005	—	24
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.21	0.16	1.6	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	266	266	0.01	0.01	0.03	270
Vendor	0.03	0.02	0.72	0.26	< 0.005	0.01	0.14	0.15	0.01	0.04	0.05	—	506	506	0.01	0.08	0.03	529
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	17	17	< 0.005	< 0.005	0.03	17
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	31	31	< 0.005	< 0.005	0.03	32
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.8	2.8	< 0.005	< 0.005	< 0.005	2.8
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.1	5.1	< 0.005	< 0.005	< 0.005	5.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.11. Paving (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.88	0.74	6.9	10.0	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.30	0.30	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.38	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	83	83	< 0.005	< 0.005	—	83
Paving	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14	14	< 0.005	< 0.005	—	14
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.05	0.47	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	77	77	< 0.005	< 0.005	0.01	78
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.4	4.4	< 0.005	< 0.005	0.01	4.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.72	0.72	< 0.005	< 0.005	< 0.005	0.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.13. Architectural Coating (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.83	1.1	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	38	38	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.3	7.3	< 0.005	< 0.005	—	7.3

Architect Coatings	2.1	2.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.2	1.2	< 0.005	< 0.005	—	1.2	
Architectural Coatings	0.38	0.38	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.33	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	53	53	< 0.005	< 0.005	0.01	54	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.0	3.0	< 0.005	< 0.005	< 0.005	3.1	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.50	0.50	< 0.005	< 0.005	< 0.005	0.51	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	10	9.8	9.3	80	0.19	0.16	16	16	0.15	4.1	4.3	—	19,142	19,142	0.71	0.89	60	19,485
Junior College (2yr)	0.54	0.50	0.48	4.1	0.01	0.01	0.84	0.84	0.01	0.21	0.22	—	985	985	0.04	0.05	3.1	1,003
Unrefrigerated Warehouse-No Rail	0.26	0.24	0.23	2.0	< 0.005	< 0.005	0.41	0.41	< 0.005	0.10	0.11	—	478	478	0.02	0.02	1.5	486
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	11	11	10.0	86	0.20	0.17	17	18	0.16	4.4	4.6	—	20,604	20,604	0.76	0.96	64	20,974
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Govern Office Building	9.5	8.7	11	66	0.17	0.16	16	16	0.15	4.1	4.3	—	17,517	17,517	0.80	0.96	1.6	17,824
Junior College (2yr)	0.49	0.45	0.55	3.4	0.01	0.01	0.84	0.84	0.01	0.21	0.22	—	901	901	0.04	0.05	0.08	917
Unrefrigerated Warehouse-No Rail	0.24	0.22	0.26	1.6	< 0.005	< 0.005	0.41	0.41	< 0.005	0.10	0.11	—	437	437	0.02	0.02	0.04	445
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	10	9.4	11	71	0.18	0.17	17	18	0.16	4.4	4.6	—	18,855	18,855	0.86	1.0	1.7	19,186
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Governent Office Building	1.2	1.2	1.3	8.8	0.02	0.02	2.1	2.1	0.02	0.53	0.55	—	2,127	2,127	0.09	0.11	3.1	2,165
Junior College (2yr)	0.07	0.07	0.08	0.51	< 0.005	< 0.005	0.12	0.12	< 0.005	0.03	0.03	—	123	123	0.01	0.01	0.18	125
Unrefrigerated Warehouse-No Rail	0.04	0.04	0.05	0.31	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	74	74	< 0.005	< 0.005	0.11	76
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.4	1.3	1.4	9.6	0.03	0.02	2.3	2.3	0.02	0.58	0.60	—	2,324	2,324	0.10	0.12	3.3	2,365

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	—	2,588	2,588	0.19	0.02	—	2,600
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	—	80	80	0.01	< 0.005	—	81
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	232	232	0.02	< 0.005	—	233
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	87	87	0.01	< 0.005	—	88
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,988	2,988	0.22	0.03	—	3,001

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	—	2,588	2,588	0.19	0.02	—	2,600
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	—	80	80	0.01	< 0.005	—	81
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	232	232	0.02	< 0.005	—	233
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	87	87	0.01	< 0.005	—	88
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,988	2,988	0.22	0.03	—	3,001
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	—	428	428	0.03	< 0.005	—	430
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	—	13	13	< 0.005	< 0.005	—	13
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	38	38	< 0.005	< 0.005	—	39

Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	14	14	< 0.005	< 0.005	—	15
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	495	495	0.04	< 0.005	—	497

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	0.12	0.06	1.1	0.90	0.01	0.08	—	0.08	0.08	—	0.08	—	1,272	1,272	0.11	< 0.005	—	1,276
Junior College (2yr)	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	89	89	0.01	< 0.005	—	89
Unrefrigerated Warehouse-No Rail	0.02	0.01	0.16	0.13	< 0.005	0.01	—	0.01	0.01	—	0.01	—	186	186	0.02	< 0.005	—	187
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.14	0.07	1.3	1.1	0.01	0.10	—	0.10	0.10	—	0.10	—	1,547	1,547	0.14	< 0.005	—	1,552
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	0.12	0.06	1.1	0.90	0.01	0.08	—	0.08	0.08	—	0.08	—	1,272	1,272	0.11	< 0.005	—	1,276
Junior College (2yr)	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	89	89	0.01	< 0.005	—	89
Unrefrigerated Warehouse-No Rail	0.02	0.01	0.16	0.13	< 0.005	0.01	—	0.01	0.01	—	0.01	—	186	186	0.02	< 0.005	—	187
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.14	0.07	1.3	1.1	0.01	0.10	—	0.10	0.10	—	0.10	—	1,547	1,547	0.14	< 0.005	—	1,552
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	211	211	0.02	< 0.005	—	211
Junior College (2yr)	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15	15	< 0.005	< 0.005	—	15

Unrefrigerated	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	31	31	< 0.005	< 0.005	—	31
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02	—	256	256	0.02	< 0.005	—	257

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	3.2	3.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.21	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.2	1.1	0.05	6.5	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27	27	< 0.005	< 0.005	—	27
Total	4.6	4.5	0.05	6.5	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27	27	< 0.005	< 0.005	—	27

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	3.2	3.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.21	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	3.4	3.4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.59	0.59	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.10	0.10	< 0.005	0.58	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.2	2.2	< 0.005	< 0.005	—	2.2
Total	0.73	0.72	< 0.005	0.58	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.2	2.2	< 0.005	< 0.005	—	2.2

#### 4.4. Water Emissions by Land Use

##### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Govern Office Building	—	—	—	—	—	—	—	—	—	—	—	41	105	146	4.2	0.10	—	282
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	0.58	1.5	2.1	0.06	< 0.005	—	4.0
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	16	40	55	1.6	0.04	—	106
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	57	146	203	5.9	0.14	—	392
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	41	105	146	4.2	0.10	—	282
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	0.58	1.5	2.1	0.06	< 0.005	—	4.0
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	16	40	55	1.6	0.04	—	106
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	57	146	203	5.9	0.14	—	392
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	6.8	17	24	0.70	0.02	—	47
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	0.10	0.25	0.34	0.01	< 0.005	—	0.66
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	2.6	6.6	9.1	0.26	0.01	—	18
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	9.5	24	34	0.97	0.02	—	65

## 4.5. Waste Emissions by Land Use

### 4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	54	0.00	54	5.4	0.00	—	189
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	4.3	0.00	4.3	0.43	0.00	—	15
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	18	0.00	18	1.8	0.00	—	62
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	76	0.00	76	7.6	0.00	—	267
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	54	0.00	54	5.4	0.00	—	189
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	4.3	0.00	4.3	0.43	0.00	—	15

Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	18	0.00	18	1.8	0.00	—	62
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	76	0.00	76	7.6	0.00	—	267
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	9.0	0.00	9.0	0.90	0.00	—	31
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	0.72	0.00	0.72	0.07	0.00	—	2.5
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	2.9	0.00	2.9	0.29	0.00	—	10
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	13	0.00	13	1.3	0.00	—	44

## 4.6. Refrigerant Emissions by Land Use

### 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.26	0.26
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.29	0.29
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.26	0.26
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.29	0.29
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
-------	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	------	------

#### 4.7. Offroad Emissions By Equipment Type

##### 4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.8. Stationary Emissions By Equipment Type

##### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.9. User Defined Emissions By Equipment Type

##### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.10. Soil Carbon Accumulation By Vegetation Type

##### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetati on	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
-------------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2026	1/29/2026	5.0	20	—
Site Preparation	Site Preparation	1/30/2026	2/13/2026	5.0	10.0	—
Grading	Grading	2/14/2026	3/14/2026	5.0	20	—
Building Construction	Building Construction	3/15/2026	1/31/2027	5.0	230	—
Paving	Paving	2/1/2027	3/1/2027	5.0	20	—
Architectural Coating	Architectural Coating	3/2/2027	3/30/2027	5.0	20	—

### 5.2. Off-Road Equipment

#### 5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.0	33	0.73
Demolition	Excavators	Diesel	Average	3.0	8.0	36	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.0	8.0	367	0.40
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.0	8.0	367	0.40
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	4.0	8.0	84	0.37
Grading	Excavators	Diesel	Average	1.00	8.0	36	0.38
Grading	Graders	Diesel	Average	1.00	8.0	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.0	367	0.40
Grading	Tractors/Loaders/Back hoes	Diesel	Average	3.0	8.0	84	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.0	367	0.29
Building Construction	Forklifts	Diesel	Average	3.0	8.0	82	0.20

Building Construction	Generator Sets	Diesel	Average	1.00	8.0	14	0.74
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	3.0	7.0	84	0.37
Building Construction	Welders	Diesel	Average	1.00	8.0	46	0.45
Paving	Pavers	Diesel	Average	2.0	8.0	81	0.42
Paving	Paving Equipment	Diesel	Average	2.0	8.0	89	0.36
Paving	Rollers	Diesel	Average	2.0	8.0	36	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.0	37	0.48

## 5.3. Construction Vehicles

### 5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Worker	15	7.7	LDA,LDT1,LDT2
Demolition	Vendor	—	6.8	HHDT,MHDT
Demolition	Hauling	0.00	20	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	Worker	18	7.7	LDA,LDT1,LDT2
Site Preparation	Vendor	—	6.8	HHDT,MHDT
Site Preparation	Hauling	0.00	20	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	15	7.7	LDA,LDT1,LDT2
Grading	Vendor	—	6.8	HHDT,MHDT
Grading	Hauling	0.00	20	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	52	7.7	LDA,LDT1,LDT2
Building Construction	Vendor	24	6.8	HHDT,MHDT
Building Construction	Hauling	0.00	20	HHDT
Building Construction	Onsite truck	—	—	HHDT

Paving	Worker	15	7.7	LDA,LDT1,LDT2
Paving	Vendor	—	6.8	HHDT,MHDT
Paving	Hauling	0.00	20	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	10	7.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	6.8	HHDT,MHDT
Architectural Coating	Hauling	0.00	20	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

## 5.4. Vehicles

### 5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

## 5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	223,800	74,600	14,016

## 5.6. Dust Mitigation

### 5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	—	0.00
Site Preparation	—	—	15	0.00	0.00
Grading	—	—	20	0.00	0.00
Paving	0.00	0.00	0.00	0.00	5.4

### 5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

## 5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Government Office Building	0.00	0%
Paving	Junior College (2yr)	0.00	0%
Paving	Unrefrigerated Warehouse-No Rail	0.00	0%
Paving	Other Non-Asphalt Surfaces	2.3	0%
Paving	Parking Lot	1.8	100%
Paving	Other Non-Asphalt Surfaces	0.77	0%
Paving	Other Asphalt Surfaces	0.46	100%

## 5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	453	0.03	< 0.005
2027	0.00	453	0.03	< 0.005

## 5.9. Operational Mobile Sources

### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VM/Weekday	VM/Saturday	VM/Sunday	VM/Year
Government Office Building	2,440	0.00	0.00	636,070	22,867	0.00	0.00	5,961,848
Junior College (2yr)	126	70	7.5	36,754	1,177	653	70	344,497
Unrefrigerated Warehouse-No Rail	61	61	61	22,229	571	571	571	208,346
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

## 5.10. Operational Area Sources

### 5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Government Office Building	Wood Fireplaces	0	0
Government Office Building	Gas Fireplaces	0	0
Government Office Building	Propane Fireplaces	0	0
Government Office Building	Electric Fireplaces	0	0
Government Office Building	No Fireplaces	0	0
Government Office Building	Conventional Wood Stoves	0	0
Government Office Building	Catalytic Wood Stoves	0	0
Government Office Building	Non-Catalytic Wood Stoves	0	0
Government Office Building	Pellet Wood Stoves	0	0
Junior College (2yr)	Wood Fireplaces	0	0
Junior College (2yr)	Gas Fireplaces	0	0
Junior College (2yr)	Propane Fireplaces	0	0
Junior College (2yr)	Electric Fireplaces	0	0
Junior College (2yr)	No Fireplaces	0	0
Junior College (2yr)	Conventional Wood Stoves	0	0
Junior College (2yr)	Catalytic Wood Stoves	0	0
Junior College (2yr)	Non-Catalytic Wood Stoves	0	0
Junior College (2yr)	Pellet Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Wood Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	Gas Fireplaces	0	0

Unrefrigerated Warehouse-No Rail	Propane Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	Electric Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	No Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	Conventional Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Catalytic Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Non-Catalytic Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Pellet Wood Stoves	0	0
Other Non-Asphalt Surfaces	Wood Fireplaces	0	0
Other Non-Asphalt Surfaces	Gas Fireplaces	0	0
Other Non-Asphalt Surfaces	Propane Fireplaces	0	0
Other Non-Asphalt Surfaces	Electric Fireplaces	0	0
Other Non-Asphalt Surfaces	No Fireplaces	0	0
Other Non-Asphalt Surfaces	Conventional Wood Stoves	0	0
Other Non-Asphalt Surfaces	Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Pellet Wood Stoves	0	0
Parking Lot	Wood Fireplaces	0	0
Parking Lot	Gas Fireplaces	0	0
Parking Lot	Propane Fireplaces	0	0
Parking Lot	Electric Fireplaces	0	0
Parking Lot	No Fireplaces	0	0
Parking Lot	Conventional Wood Stoves	0	0
Parking Lot	Catalytic Wood Stoves	0	0
Parking Lot	Non-Catalytic Wood Stoves	0	0
Parking Lot	Pellet Wood Stoves	0	0
Other Non-Asphalt Surfaces	Wood Fireplaces	0	0
Other Non-Asphalt Surfaces	Gas Fireplaces	0	0
Other Non-Asphalt Surfaces	Propane Fireplaces	0	0

Other Non-Asphalt Surfaces	Electric Fireplaces	0	0
Other Non-Asphalt Surfaces	No Fireplaces	0	0
Other Non-Asphalt Surfaces	Conventional Wood Stoves	0	0
Other Non-Asphalt Surfaces	Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Pellet Wood Stoves	0	0
Other Asphalt Surfaces	Wood Fireplaces	0	0
Other Asphalt Surfaces	Gas Fireplaces	0	0
Other Asphalt Surfaces	Propane Fireplaces	0	0
Other Asphalt Surfaces	Electric Fireplaces	0	0
Other Asphalt Surfaces	No Fireplaces	0	0
Other Asphalt Surfaces	Conventional Wood Stoves	0	0
Other Asphalt Surfaces	Catalytic Wood Stoves	0	0
Other Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0
Other Asphalt Surfaces	Pellet Wood Stoves	0	0

### 5.10.2. Architectural Coatings

—	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
undefined	0.00	0.00	223,800	74,600	14,016

### 5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

### 5.11. Operational Energy Consumption

## 5.11.1. Unmitigated

## Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Government Office Building	2,084,306	453	0.0330	0.0040	3,968,973
Junior College (2yr)	64,808	453	0.0330	0.0040	277,206
Unrefrigerated Warehouse-No Rail	187,044	453	0.0330	0.0040	581,580
Other Non-Asphalt Surfaces	0.00	453	0.0330	0.0040	0.00
Parking Lot	70,255	453	0.0330	0.0040	0.00
Other Non-Asphalt Surfaces	0.00	453	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	453	0.0330	0.0040	0.00

## 5.12. Operational Water and Wastewater Consumption

## 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Government Office Building	21,455,246	0.00
Junior College (2yr)	304,104	0.00
Unrefrigerated Warehouse-No Rail	8,093,750	0.00
Other Non-Asphalt Surfaces	0.00	0.00
Parking Lot	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00
Other Asphalt Surfaces	0.00	0.00

## 5.13. Operational Waste Generation

## 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
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Government Office Building	100	0.00
Junior College (2yr)	8.1	0.00
Unrefrigerated Warehouse-No Rail	33	0.00
Other Non-Asphalt Surfaces	0.00	0.00
Parking Lot	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00
Other Asphalt Surfaces	0.00	0.00

## 5.14. Operational Refrigeration and Air Conditioning Equipment

### 5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Government Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
Government Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.0	4.0	18
Junior College (2yr)	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
Junior College (2yr)	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.0	4.0	18
Junior College (2yr)	Stand-alone retail refrigerators and freezers	R-134a	1,430	< 0.005	1.00	0.00	1.00
Junior College (2yr)	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.5	7.5	20

## 5.15. Operational Off-Road Equipment

### 5.15.1. Unmitigated

## 5.16. Stationary Sources

### 5.16.1. Emergency Generators and Fire Pumps

### 5.16.2. Process Boilers

## 5.17. User Defined

## 5.18. Vegetation

### 5.18.1. Land Use Change

#### 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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#### 5.18.1. Biomass Cover Type

##### 5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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### 5.18.2. Sequestration

#### 5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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## 6. Climate Risk Detailed Report

### 6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	36	annual days of extreme heat
Extreme Precipitation	1.3	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about  $\frac{3}{4}$  an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

## 6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	5	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	0	0	0	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

## 6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	5	1	1	4
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	1	1	1	2
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

## 6.4. Climate Risk Reduction Measures

# 7. Health and Equity Details

## 7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	89
AQ-PM	98
AQ-DPM	44
Drinking Water	68
Lead Risk Housing	21

Pesticides	90
Toxic Releases	68
Traffic	31
Effect Indicators	—
CleanUp Sites	32
Groundwater	71
Haz Waste Facilities/Generators	62
Impaired Water Bodies	12
Solid Waste	36
Sensitive Population	—
Asthma	47
Cardio-vascular	54
Low Birth Weights	38
Socioeconomic Factor Indicators	—
Education	49
Housing	8.5
Linguistic	8.5
Poverty	60
Unemployment	67

## 7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	54.27948159
Employed	86.78301039
Median HI	46.70858463
Education	—

Bachelor's or higher	50.28872065
High school enrollment	17.31040678
Preschool enrollment	17.29757475
Transportation	—
Auto Access	69.12613884
Active commuting	2.24560503
Social	—
2-parent households	52.58565379
Voting	71.60272039
Neighborhood	—
Alcohol availability	58.44989093
Park access	19.90247658
Retail density	23.36712434
Supermarket access	40.27973823
Tree canopy	17.1435904
Housing	—
Homeownership	62.86410882
Housing habitability	68.20223277
Low-inc homeowner severe housing cost burden	76.65853972
Low-inc renter severe housing cost burden	42.61516746
Uncrowded housing	57.46182471
Health Outcomes	—
Insured adults	65.30219428
Arthritis	38.0
Asthma ER Admissions	41.2
High Blood Pressure	43.5
Cancer (excluding skin)	29.3
Asthma	43.1

Coronary Heart Disease	43.7
Chronic Obstructive Pulmonary Disease	40.0
Diagnosed Diabetes	65.9
Life Expectancy at Birth	27.8
Cognitively Disabled	16.7
Physically Disabled	22.7
Heart Attack ER Admissions	53.6
Mental Health Not Good	48.5
Chronic Kidney Disease	55.3
Obesity	36.0
Pedestrian Injuries	58.4
Physical Health Not Good	51.8
Stroke	45.2
Health Risk Behaviors	—
Binge Drinking	30.9
Current Smoker	52.6
No Leisure Time for Physical Activity	50.7
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	36.4
Elderly	42.6
English Speaking	73.5
Foreign-born	17.6
Outdoor Workers	29.6
Climate Change Adaptive Capacity	—
Impervious Surface Cover	62.2
Traffic Density	45.5

Traffic Access	0.0
Other Indices	—
Hardship	44.2
Other Decision Support	—
2016 Voting	62.3

### 7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	60
Healthy Places Index Score for Project Location (b)	49
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

### 7.4. Health & Equity Measures

No Health & Equity Measures selected.

### 7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

### 7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

## 8. User Changes to Default Data

### 8.1. Justifications

**ATTACHMENT 3 - HRA RESULTS**



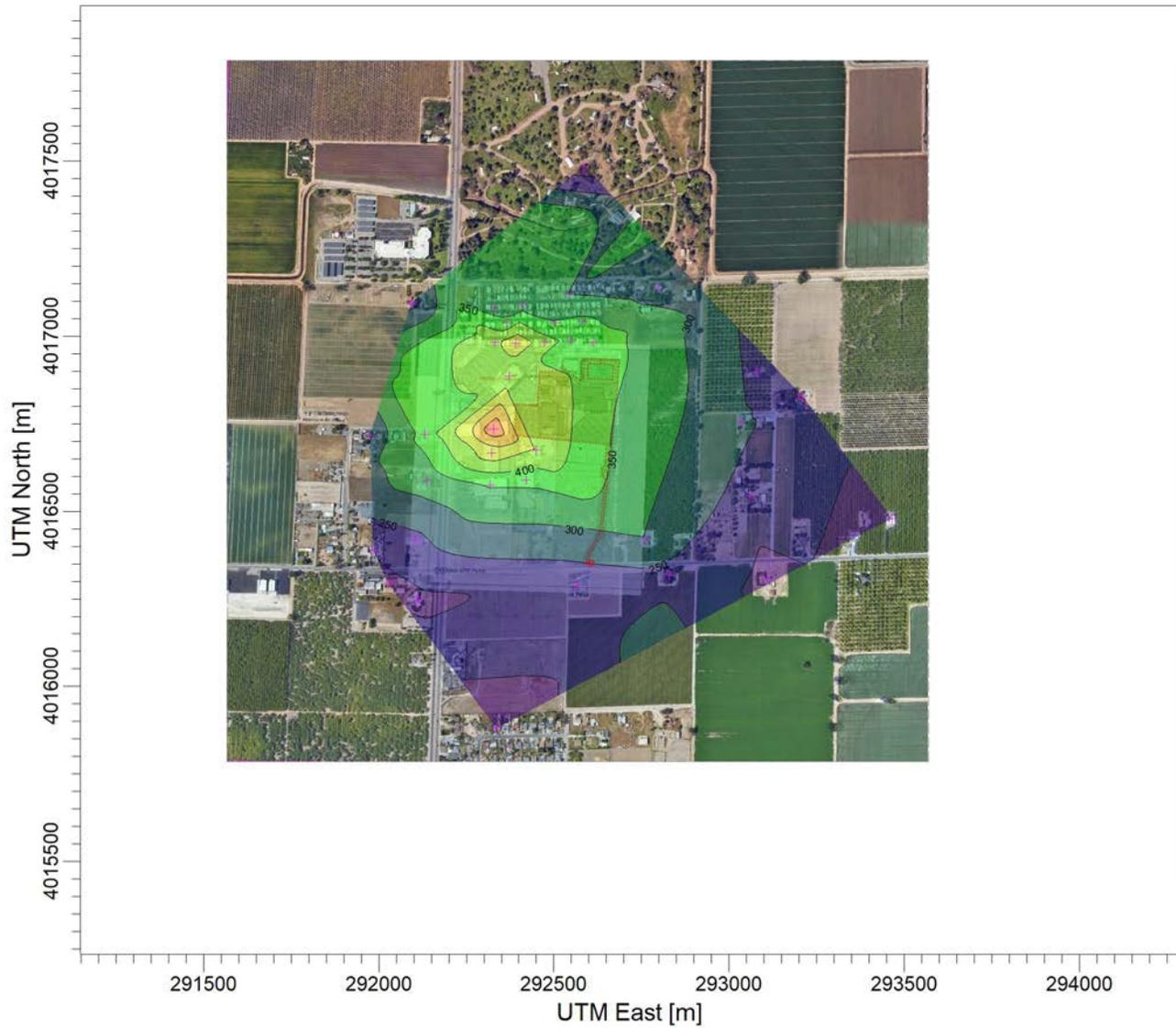
Core Environmental Consulting

Clovis, CA 93612  
(559) 202-3941

PROJECT NAME	DATE	SCALE	<b>RECEPTOR MAP</b>
TCOE ACC	12/1/25	NOT TO SCALE	
PROJECT NUMBER	DRAWN BY	LAT/LONG	
<b>25017</b>	<b>JM</b>	<b>36.273752, -119.309346</b>	

PROJECT TITLE:

C:\Lakes\AERMOD View\25017 - TCOE ACC HRA\25017 - TCOE ACC HRA.isc



PLOT FILE OF HIGH 1ST HIGH 1-HR VALUES FOR SOURCE GROUP: PAREA1

ug/m<sup>3</sup>

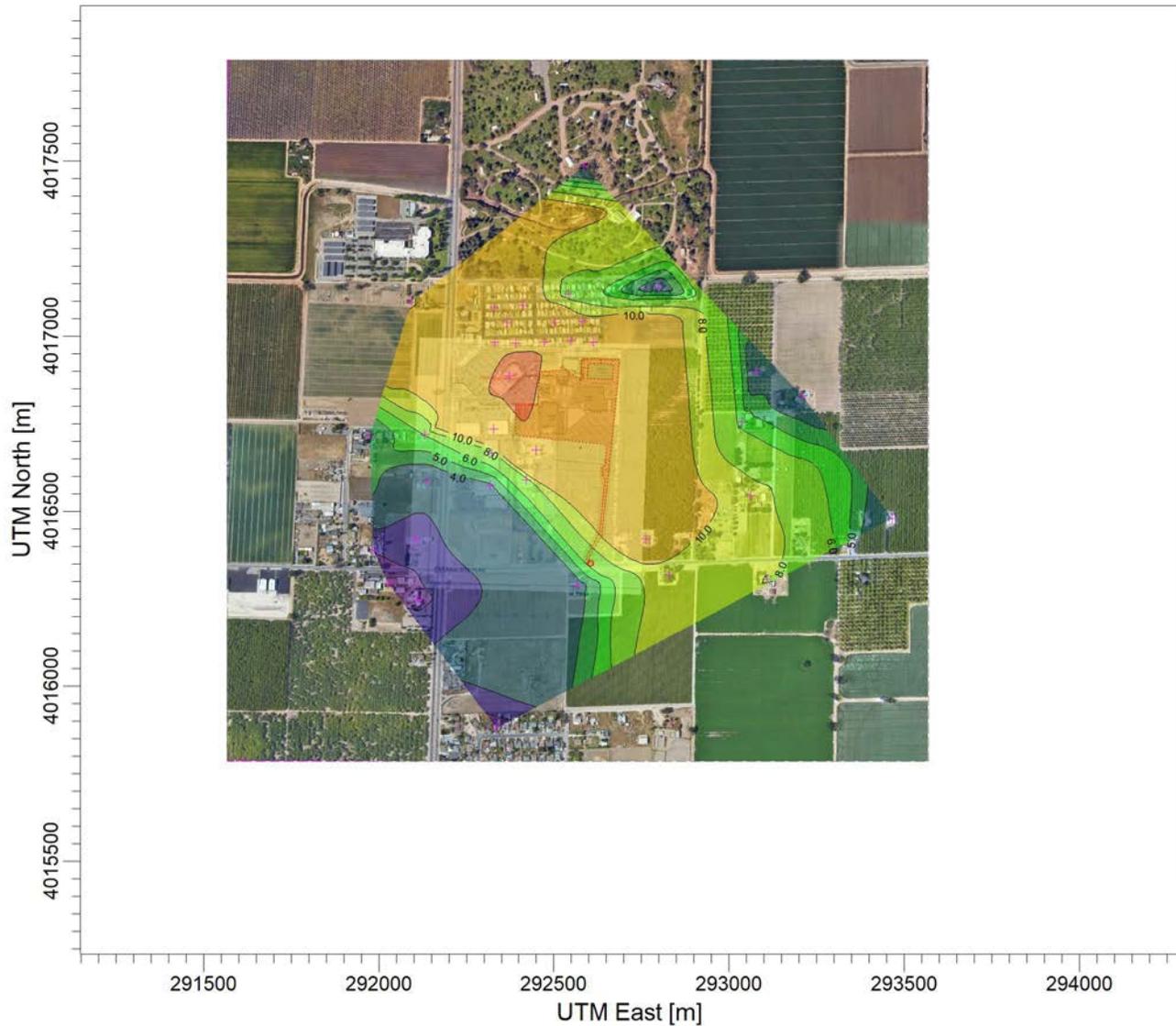
Max: 590 [ug/m<sup>3</sup>] at (292328.02, 4016735.15)



COMMENTS:	SOURCES: <b>1</b>	COMPANY NAME:	
	RECEPTORS: <b>37</b>	MODELER:	
	OUTPUT TYPE: <b>Concentration</b>	SCALE: 1:19,693	
	MAX: <b>590 ug/m<sup>3</sup></b>	DATE: <b>12/2/2025</b>	PROJECT NO.:

PROJECT TITLE:

C:\Lakes\AERMOD View\25017 - TCOE ACC HRA\25017 - TCOE ACC HRA.isc



PLOT FILE OF PERIOD VALUES AVERAGED ACROSS 0 YEARS FOR SOURCE GROUP: PAREA1

ug/m<sup>3</sup>

Max: 39.4 [ug/m<sup>3</sup>] at (292372.83, 4016885.40)



COMMENTS:	SOURCES: <b>1</b>	COMPANY NAME:	
	RECEPTORS: <b>37</b>	MODELER:	
	OUTPUT TYPE: <b>Concentration</b>	SCALE: 1:19,693	
	MAX: <b>39.4 ug/m<sup>3</sup></b>	DATE: <b>12/2/2025</b>	PROJECT NO.:

\*\*HARP - Air Dispersion Modeling and Risk Tool v22118

\*\*12/2/2025

\*\*Exported Risk Results

REC	X	Y	RISK_SUM	SCENARIO	INHAL_RISK
1	292612.9	4016982	1.06E-05	2YrCancerDerived_Inh	1.06E-05
2	292546.9	4016987	1.32E-05	2YrCancerDerived_Inh	1.32E-05
3	292473.2	4016983	1.56E-05	2YrCancerDerived_Inh	1.56E-05
4	292502.4	4017038	8.84E-06	2YrCancerDerived_Inh	8.84E-06
5	292582.4	4017042	6.53E-06	2YrCancerDerived_Inh	6.53E-06
6	292390.7	4016980	1.57E-05	2YrCancerDerived_Inh	1.57E-05
7	292331	4016982	1.35E-05	2YrCancerDerived_Inh	1.35E-05
8	292366.6	4017038	1.03E-05	2YrCancerDerived_Inh	1.03E-05
9	292328.5	4017081	7.84E-06	2YrCancerDerived_Inh	7.84E-06
10	292411	4017088	7.19E-06	2YrCancerDerived_Inh	7.19E-06
11	292540.5	4017119	4.19E-06	2YrCancerDerived_Inh	4.19E-06
12	292799.3	4017140	1.69E-06	2YrCancerDerived_Inh	1.69E-06
13	293079.8	4016898	1.29E-06	2YrCancerDerived_Inh	1.29E-06
14	293035.5	4016757	3.32E-06	2YrCancerDerived_Inh	3.32E-06
15	293060.9	4016544	5.22E-06	2YrCancerDerived_Inh	5.22E-06
16	292763.4	4016421	8.47E-06	2YrCancerDerived_Inh	8.47E-06
17	292565.1	4016290	1.99E-06	2YrCancerDerived_Inh	1.99E-06
18	292829.4	4016317	5.43E-06	2YrCancerDerived_Inh	5.43E-06
19	292336.4	4015880	3.50E-07	2YrCancerDerived_Inh	3.50E-07
20	293107	4016306	4.69E-06	2YrCancerDerived_Inh	4.69E-06
21	293464.3	4016480	1.59E-06	2YrCancerDerived_Inh	1.59E-06
22	293209	4016829	1.29E-06	2YrCancerDerived_Inh	1.29E-06
23	292586.3	4017485	8.90E-07	2YrCancerDerived_Inh	8.90E-07
24	292093.4	4017096	5.41E-06	2YrCancerDerived_Inh	5.41E-06
25	292130.3	4016719	3.58E-06	2YrCancerDerived_Inh	3.58E-06
26	291974.8	4016717	2.31E-06	2YrCancerDerived_Inh	2.31E-06
27	291985.3	4016387	5.97E-07	2YrCancerDerived_Inh	5.97E-07
28	<del>292373</del>	<del>4016885</del>	<del>2.33E-05</del>	<del>2YrCancerDerived_Inh</del>	<del>2.33E-05</del> Resident value
28	292372.8	4016885	3.52E-07	2YrCancerDerived_Inh	3.52E-07 Worker value
29	292328	4016735	1.01E-05	2YrCancerDerived_Inh	1.01E-05
30	292322.7	4016667	4.29E-06	2YrCancerDerived_Inh	4.29E-06
31	292317.5	4016574	2.26E-06	2YrCancerDerived_Inh	2.26E-06
32	292449.3	4016675	1.56E-05	2YrCancerDerived_Inh	1.56E-05
33	292420.3	4016590	4.36E-06	2YrCancerDerived_Inh	4.36E-06
34	292138.2	4016588	1.56E-06	2YrCancerDerived_Inh	1.56E-06
35	292104	4016419	7.65E-07	2YrCancerDerived_Inh	7.65E-07
36	292111.9	4016248	4.22E-07	2YrCancerDerived_Inh	4.22E-07

\*\*HARP - Air Dispersion Modeling and Risk Tool v22118

\*\*12/2/2025

\*\*Exported Risk Results

REC	X	Y	SCENARIO	RESP	MAXHI	
1	292612.9	4016982	NonCancerChronicDerived_Inh	0.006183	0.006183	
2	292546.9	4016987	NonCancerChronicDerived_Inh	0.007694	0.007694	
3	292473.2	4016983	NonCancerChronicDerived_Inh	0.009095	0.009095	
4	292502.4	4017038	NonCancerChronicDerived_Inh	0.005169	0.005169	
5	292582.4	4017042	NonCancerChronicDerived_Inh	0.003816	0.003816	
6	292390.7	4016980	NonCancerChronicDerived_Inh	0.009165	0.009165	
7	292331	4016982	NonCancerChronicDerived_Inh	0.007895	0.007895	
8	292366.6	4017038	NonCancerChronicDerived_Inh	0.006008	0.006008	
9	292328.5	4017081	NonCancerChronicDerived_Inh	0.004583	0.004583	
10	292411	4017088	NonCancerChronicDerived_Inh	0.004203	0.004203	
11	292540.5	4017119	NonCancerChronicDerived_Inh	0.00245	0.00245	
12	292799.3	4017140	NonCancerChronicDerived_Inh	0.000991	0.000991	
13	293079.8	4016898	NonCancerChronicDerived_Inh	0.000755	0.000755	
14	293035.5	4016757	NonCancerChronicDerived_Inh	0.00194	0.00194	
15	293060.9	4016544	NonCancerChronicDerived_Inh	0.003054	0.003054	
16	292763.4	4016421	NonCancerChronicDerived_Inh	0.004951	0.004951	
17	292565.1	4016290	NonCancerChronicDerived_Inh	0.001161	0.001161	
18	292829.4	4016317	NonCancerChronicDerived_Inh	0.003177	0.003177	
19	292336.4	4015880	NonCancerChronicDerived_Inh	0.000205	0.000205	
20	293107	4016306	NonCancerChronicDerived_Inh	0.002744	0.002744	
21	293464.3	4016480	NonCancerChronicDerived_Inh	0.00093	0.00093	
22	293209	4016829	NonCancerChronicDerived_Inh	0.000756	0.000756	
23	292586.3	4017485	NonCancerChronicDerived_Inh	0.00052	0.00052	
24	292093.4	4017096	NonCancerChronicDerived_Inh	0.003166	0.003166	
25	292130.3	4016719	NonCancerChronicDerived_Inh	0.002093	0.002093	
26	291974.8	4016717	NonCancerChronicDerived_Inh	0.00135	0.00135	
27	291985.3	4016387	NonCancerChronicDerived_Inh	0.000349	0.000349	
28	292373	4016885	NonCancerChronicDerived_Inh	0.01362	0.01362	Resident Value
28	292372.8	4016885	NonCancerChronicDerived_Inh	0.013617	0.013617	Worker Value
29	292328	4016735	NonCancerChronicDerived_Inh	0.005905	0.005905	
30	292322.7	4016667	NonCancerChronicDerived_Inh	0.002508	0.002508	
31	292317.5	4016574	NonCancerChronicDerived_Inh	0.00132	0.00132	
32	292449.3	4016675	NonCancerChronicDerived_Inh	0.009102	0.009102	
33	292420.3	4016590	NonCancerChronicDerived_Inh	0.00255	0.00255	
34	292138.2	4016588	NonCancerChronicDerived_Inh	0.00091	0.00091	
35	292104	4016419	NonCancerChronicDerived_Inh	0.000447	0.000447	
36	292111.9	4016248	NonCancerChronicDerived_Inh	0.000247	0.000247	

HARP Project Summary Report 12/2/2025 4:11:33 PM

\*\*\*PROJECT INFORMATION\*\*\*

HARP Version: 22118  
 Project Name: 25017 - TCOE ACC HRA  
 Project Output Directory: C:\HARP2\Projects\25017 - TCOE ACC HRA  
 HARP Database: NA

\*\*\*FACILITY INFORMATION\*\*\*

Origin  
 X (m):0  
 Y (m):0  
 Zone:1  
 No. of Sources:0  
 No. of Buildings:0

\*\*\*EMISSION INVENTORY\*\*\*

No. of Pollutants:1  
 No. of Background Pollutants:0

Emissions

ScrID	StkID	ProID	PolID	PolAbbrev	
Multi	Annual Ems	MaxHr Ems	MWAF		
	(lbs/yr)	(lbs/hr)			
PAREA1	0	0	9901	DieselExhPM	1
	120	0	1		

Background

PolID	PolAbbrev	Conc (ug/m^3)	MWAF
-------	-----------	---------------	------

Ground level concentration files (\glc\)

9901MAXHR.txt  
 9901PER.txt

\*\*\*POLLUTANT HEALTH INFORMATION\*\*\*

Health Database: C:\HARP2\Tables\HEALTH17320.mdb  
 Health Table Version: HEALTH22013  
 Official: True

PolID	PolAbbrev	InhCancer	OralCancer	AcuteREL
InhChronicREL	OralChronicREL	InhChronic8HRREL		
9901	DieselExhPM	1.1		5

\*\*\*AIR DISPERSION MODELING INFORMATION\*\*\*

Versions used in HARP. All executables were obtained from USEPA's Support Center for Regulatory Atmospheric Modeling website (<http://www.epa.gov/scram001/>)

AERMOD: 18081  
AERMAP: 18081  
BPIPPRM: 04274  
AERPLOT: 13329

\*\*\*METEOROLOGICAL INFORMATION\*\*\*

Version:  
Surface File:  
Profile File:  
Surface Station:  
Upper Station:  
On-Site Station:

\*\*\*LIST OF AIR DISPERSION FILES\*\*\*

AERMOD Input File:  
AERMOD Output File:  
AERMOD Error File:  
Plotfile list

---

\*\*\*LIST OF RISK ASSESSMENT FILES\*\*\*

Health risk analysis files (\hra\)

---

ConstructionCancerRisk.csv  
ConstructionCancerRiskSumByRec.csv  
ConstructionGLCLList.csv  
ConstructionHRAInput.hra  
ConstructionNCAcuteRisk.csv  
ConstructionNCAcuteRiskSumByRec.csv  
ConstructionNCChronicRisk.csv  
ConstructionNCChronicRiskSumByRec.csv  
ConstructionOutput.txt  
ConstructionPathwayRec.csv  
ConstructionPolDB.csv  
ResidentCancerRisk.csv  
ResidentCancerRiskSumByRec.csv  
ResidentGLCLList.csv  
ResidentHRAInput.hra  
ResidentNCAcuteRisk.csv  
ResidentNCAcuteRiskSumByRec.csv  
ResidentNCChronicRisk.csv  
ResidentNCChronicRiskSumByRec.csv  
ResidentOutput.txt  
ResidentPathwayRec.csv  
ResidentPolDB.csv  
WorkerCancerRisk.csv

WorkerCancerRiskSumByRec.csv  
WorkerGLCList.csv  
WorkerHRAInput.hra  
WorkerNCAcuteRisk.csv  
WorkerNCAcuteRiskSumByRec.csv  
WorkerNCChronicRisk.csv  
WorkerNCChronicRiskSumByRec.csv  
WorkerOutput.txt  
WorkerPathwayRec.csv  
WorkerPolDB.csv

Spatial averaging files (\sa\)

---

HARP Project Summary Report 12/2/2025 4:13:40 PM

\*\*\*PROJECT INFORMATION\*\*\*

HARP Version: 22118  
 Project Name: 25017 - TCOE ACC HRA  
 Project Output Directory: C:\HARP2\Projects\25017 - TCOE ACC HRA  
 HARP Database: NA

\*\*\*FACILITY INFORMATION\*\*\*

Origin  
 X (m):0  
 Y (m):0  
 Zone:1  
 No. of Sources:0  
 No. of Buildings:0

\*\*\*EMISSION INVENTORY\*\*\*

No. of Pollutants:1  
 No. of Background Pollutants:0

Emissions

ScrID	StkID	ProID	PolID	PolAbbrev	
Multi	Annual Ems	MaxHr Ems	MWAF		
	(lbs/yr)	(lbs/hr)			
PAREA1	0	0	9901	DieselExhPM	1
	120	0	1		

Background

PolID	PolAbbrev	Conc (ug/m^3)	MWAF
-------	-----------	---------------	------

Ground level concentration files (\glc\)

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 9901PER.txt

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AERMOD Output File:  
AERMOD Error File:  
Plotfile list

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\*\*\*LIST OF RISK ASSESSMENT FILES\*\*\*

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---

ConstructionCancerRisk.csv  
ConstructionCancerRiskSumByRec.csv  
ConstructionGLCLList.csv  
ConstructionHRAInput.hra  
ConstructionNCAcuteRisk.csv  
ConstructionNCAcuteRiskSumByRec.csv  
ConstructionNCChronicRisk.csv  
ConstructionNCChronicRiskSumByRec.csv  
ConstructionOutput.txt  
ConstructionPathwayRec.csv  
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ResidentCancerRisk.csv  
ResidentCancerRiskSumByRec.csv  
ResidentGLCLList.csv  
ResidentHRAInput.hra  
ResidentNCAcuteRisk.csv  
ResidentNCAcuteRiskSumByRec.csv  
ResidentNCChronicRisk.csv  
ResidentNCChronicRiskSumByRec.csv  
ResidentOutput.txt  
ResidentPathwayRec.csv  
ResidentPolDB.csv  
WorkerCancerRisk.csv

WorkerCancerRiskSumByRec.csv  
WorkerGLCList.csv  
WorkerHRAInput.hra  
WorkerNCAcuteRisk.csv  
WorkerNCAcuteRiskSumByRec.csv  
WorkerNCChronicRisk.csv  
WorkerNCChronicRiskSumByRec.csv  
WorkerOutput.txt  
WorkerPathwayRec.csv  
WorkerPolDB.csv

Spatial averaging files (\sa\)

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# Phase I Cultural Resources Assessment for the Tulare County Office of Education Administration and Conference Center Expansion Project, City of Visalia, Tulare County, California

Consuelo Y. Sauls, M.A., RPA

Prepared By



**Taylored Archaeology**  
6083 N. Figarden Dr., Ste 616  
Fresno, CA 93722

Prepared For

**4Creeks, Inc.**

324 S. Santa Fe St., Suite A  
Visalia, CA 93292

October 2025

## MANAGEMENT SUMMARY

Taylorred Archaeology completed a Phase I Cultural Resources Assessment for the Tulare County Office of Education Administration (TCOE) and Conference Center Expansion Project (Project) in Visalia, Tulare County near Visalia, California. The Project site covers approximately 37.5-acres within Tulare County Assessor's Parcel Numbers 122-480-004, -008, and 122-470-003. The TCOE proposes to expand and redevelop its existing Administration and Conference Building site and annex approximately 23 acres of the Project site into the City of Visalia. The Project is subject to the California Environmental Quality Act (CEQA).

To meet CEQA standards, Taylorred Archaeology completed this cultural resources assessment under contract to 4Creeks, Inc. to identify potential cultural resources within the 37-acre Project site. The investigation consisted of (1) a records search from the Southern San Joaquin Valley Information Center (SSJVIC) of the California Historical Resources Information System (CHRIS), (2) archival research, (3) a search of the Native American Heritage Commission's (NAHC) Sacred Lands File including the local Native American contact information list; and (4) an archaeological pedestrian survey of the Project site.

The CHRIS records search results identified three prior cultural resources studies (TU-00041, TU-01190 and TU-01747), and no cultural resources recorded within the Project area. Only one out of the three prior cultural resources studies, TU-01747, overlapped the Project site. TU-01747 was a cultural resources assessment report that surveyed the 23-acre field parcel (APN 122-470-003) that was a former walnut orchard with negative findings. The CHRIS results also reported four prior cultural resources studies within a 0.5-mile radius of the Project area, as well as two historic-era resources – the Tulare Irrigation Canal (P-54-005296) and the Mooney Park Bridge (TUL-PRO-007). Both cultural resources are outside the Project boundary and will not be impacted by the Project.

The NAHC's Sacred Lands File results search of the Project site were negative. Native American outreach and consultation with Tribes are not included in this investigation. It is assumed that government-to-government consultation under Assembly Bill (AB) 52 will be conducted by Tulare County.

The pedestrian survey resulted in negative findings with no prehistoric or historic-period cultural resources within the Project boundary. The absence of cultural material on the ground surface does not, however, preclude the possibility of Project construction unearthing buried archaeological deposits.

Based on the results of this investigation, Taylorred Archaeology concludes the Project will have a less than significant impact on cultural resources. Taylorred Archaeology also recommends the following best management practices be implemented during Project construction:

- In the event of accidental discovery of unidentified archaeological materials during development or ground disturbing activities within any portion of the Project site, all work shall be halted in the immediate vicinity (within a 100-foot radius) until a qualified archaeologist can identify the discovery and assess its significance.
- If human remains are uncovered during construction, the Tulare County Coroner is to be notified to investigate the remains and arrange proper treatment and disposition. If the remains are identified on the basis of archaeological context, age, cultural associations, or biological traits to be those of a Native American, California Health and Safety Code 7050.5 and PRC 5097.98 require that the coroner notify the NAHC within 24 hours of discovery. The NAHC will then identify the Most Likely Descendent who will be afforded an opportunity to make recommendations regarding the treatment and disposition of the remains.

A copy of this report will be submitted to the SSJVIC for inclusion in the CHRIS database.

## CONTENTS

<b>1</b>	<b>INTRODUCTION .....</b>	<b>1</b>
1.1	PROJECT DESCRIPTION AND LOCATION .....	1
1.2	REGULATORY SETTING .....	1
1.2.1	CALIFORNIA ENVIRONMENTAL QUALITY ACT .....	2
1.3	PROFESSIONAL QUALIFICATIONS .....	2
1.4	REPORT STRUCTURE .....	7
<b>2</b>	<b>PROJECT SETTING .....</b>	<b>8</b>
2.1	NATURAL ENVIRONMENT .....	8
2.2	PREHISTORIC SETTING .....	9
2.3	ETHNOGRAPHY .....	11
2.4	HISTORIC SETTING.....	12
2.4.1	California History .....	12
2.4.2	Central California History.....	12
2.4.3	Local History.....	13
<b>3</b>	<b>METHODS .....</b>	<b>15</b>
3.1	RECORDS SEARCH .....	15
3.2	ARCHIVAL RESEARCH .....	15
3.3	NAHC SACRED LANDS FILE .....	15
3.4	ARCHAEOLOGICAL PEDESTRIAN SURVEY.....	15
<b>4</b>	<b>RESULTS .....</b>	<b>17</b>
4.1	RECORDS SEARCH .....	17
4.2	ARCHIVAL RESEARCH .....	18
4.3	NATIVE AMERICAN OUTREACH .....	19
4.4	ARCHAEOLOGICAL SURVEY RESULTS.....	19
<b>5</b>	<b>SUMMARY AND RECOMMENDATION .....</b>	<b>24</b>
<b>6</b>	<b>REFERENCES.....</b>	<b>26</b>

## APPENDICES

- A Personnel Qualifications**
- B Records Search Results**
- C Sacred Lands File Search Results**

## FIGURES

Figure 1-1	Project vicinity in Tulare County, California.....	4
Figure 1-2	Project location on the USGS Visalia, CA 7.5-minute quadrangle.....	5
Figure 1-3	Aerial view of the Project boundary.....	6
Figure 4-1	Survey coverage of Project site.....	21
Figure 4-2	Basin in northern central portion of Project site, facing northwest.....	22
Figure 4-3	Basin and dirt parking lot in central portion of Project site, facing south.....	22
Figure 4-4	Eastern portion of Project site, facing north.....	23
Figure 4-5	Commercial aera of Project site, facing northwest.....	23

## TABLES

Table 4-1	Previous Cultural Resources Studies within the Project Area .....	17
Table 4-2	Previous Cultural Resources Studies within 0.5-mile of the Project Area.....	18
Table 4-3	Previously Recorded Cultural Resources within 0.5-mile radius of the Project Area.....	18



# 1 INTRODUCTION

Taylor Archaeology performed a Phase I cultural resources assessment for the Tulare County Office of Education Administration and Conference Center Expansion Project (Project) in Visalia, Tulare County near Visalia, California. As part of development approval process, the Tulare County Office of Education (TCOE) as lead agency must comply with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] 21000 [g]) mandate that the government agencies consider the impacts of a project on the environment, including cultural resources. A portion of the Project site is in unincorporated Tulare County and will be annexed into the City of Visalia. The City of Visalia will be the CEQA lead agency during the annexation and entitlements process.

## 1.1 PROJECT DESCRIPTION AND LOCATION

The TCOE proposes expanding and redeveloping its existing Administration and Conference Building site. The Project site currently includes an existing 2.5-acre parcel. TCOE has acquired an adjacent 14.4 acres, which will merge with the existing site to form a single parcel for development. The expansion will provide approximately 108,000 square feet of office and conference room space, three classrooms totaling 6,200 square feet, and approximately 35,000 square feet of warehouse space. A stormwater basin will be constructed along the southern boundary of the property for on-site drainage. Parking facilities surrounding the development will provide 388 parking stalls, including 17 accessible spaces. Vehicular access to the site will be provided from South Mooney Boulevard to the west and Avenue 264 to the south. The primary use of this facility will be to host professional development trainings and workshops for District employees.

The Project area covers approximately 37.5-acres within Tulare County Assessor's Parcel Numbers 122-480-004, -008, and 122-470-003. The Project area is on the south side of the City of Visalia, California (Figure 1-1). The Project area is within Section 18 of Township 19 South, Range 25 East, Mount Diablo Meridian of the Visalia, California 7.5-minute USGS quadrangle (Figure 1-2).

## 1.2 REGULATORY SETTING

In this report "cultural resources" are defined as prehistoric or historical archaeological sites as well as historical objects, buildings, or structures. In accordance with 30 Code of Federal Regulations (CFR) §60.4, "historical" in this report applies to cultural resources which are at least 50 years old. The significance or importance of a cultural resource is dependent upon whether the resource qualifies for inclusion at the local or state level in the California Register of Historical Resources (CRHR), or at the federal level in the National Register of Historic Places (NRHP). Cultural resources that are determined to be eligible for inclusion in the CRHR are called

Phase I Cultural Resources Assessment for the Tulare County Office of Education Administration and  
Conference Center Expansion Project

“historical resources” (California Code of Regulations [CCR] 15064.5[a]). Under this statute the determination of eligibility is partially based on the consideration of the criteria of significance as defined in 14 CCR 15064.5(a)(3). Cultural resources eligible for inclusion in the NRHP are deemed “historic properties”.

### **1.2.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT**

Pursuant to CEQA, a historical resource is a resource listed in, or determined to be eligible for listing in, the CRHR. Historical resources may include, but are not limited to, “any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically or archaeologically significant” (PRC §5020.1[j]). In addition, a resource included in a local register of historical resources or identified as significant in a local survey conducted in accordance with the state guidelines are also considered historic resources under California Public Resources Code (PRC) Section 5020.1.

CEQA details appropriate measures for the evaluation and protection of cultural resources in §15064.5 of the CEQA Guidelines. According to CEQA guidelines §15064.5 (a)(3), criteria for listing on the CRHR includes the following:

- (A) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.*
- (B) Is associated with the lives of persons important in our past.*
- (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.*
- (D) Has yielded, or may be likely to yield, information important in prehistory or history.*

According to CEQA guidelines §21074 (a)(1), criteria for tribal cultural resources includes the following:

- (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:*
  - (A) included or determined to be eligible for inclusion in the California Register of Historical Resources.*
  - (B) included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.*

Protection of cultural resources within California is additionally regulated by PRC §5097.5, which prohibits destruction, defacing, or removal of any historic or prehistoric cultural features on land under the jurisdiction of State or local authorities.

### **1.3 PROFESSIONAL QUALIFICATIONS**

Archaeologist Consuelo Y. Sauls (M.A.), a Registered Professional Archaeologist (RPA 41591505), managed the assessment and compiled this report for the Project. Ms. Sauls also conducted the Phase I Cultural Resources Assessment for the Tulare County Office of Education Administration and Conference Center Expansion Project

archival research and literature review, prepared all maps and report graphics, requested a Sacred Lands File search, and performed the archaeological pedestrian field survey of the Project site. Ms. Sauls meets the Secretary of the Interior's Standards for Professional Qualifications in Archaeology. Statement of Qualifications for key personnel is provided in Appendix A.

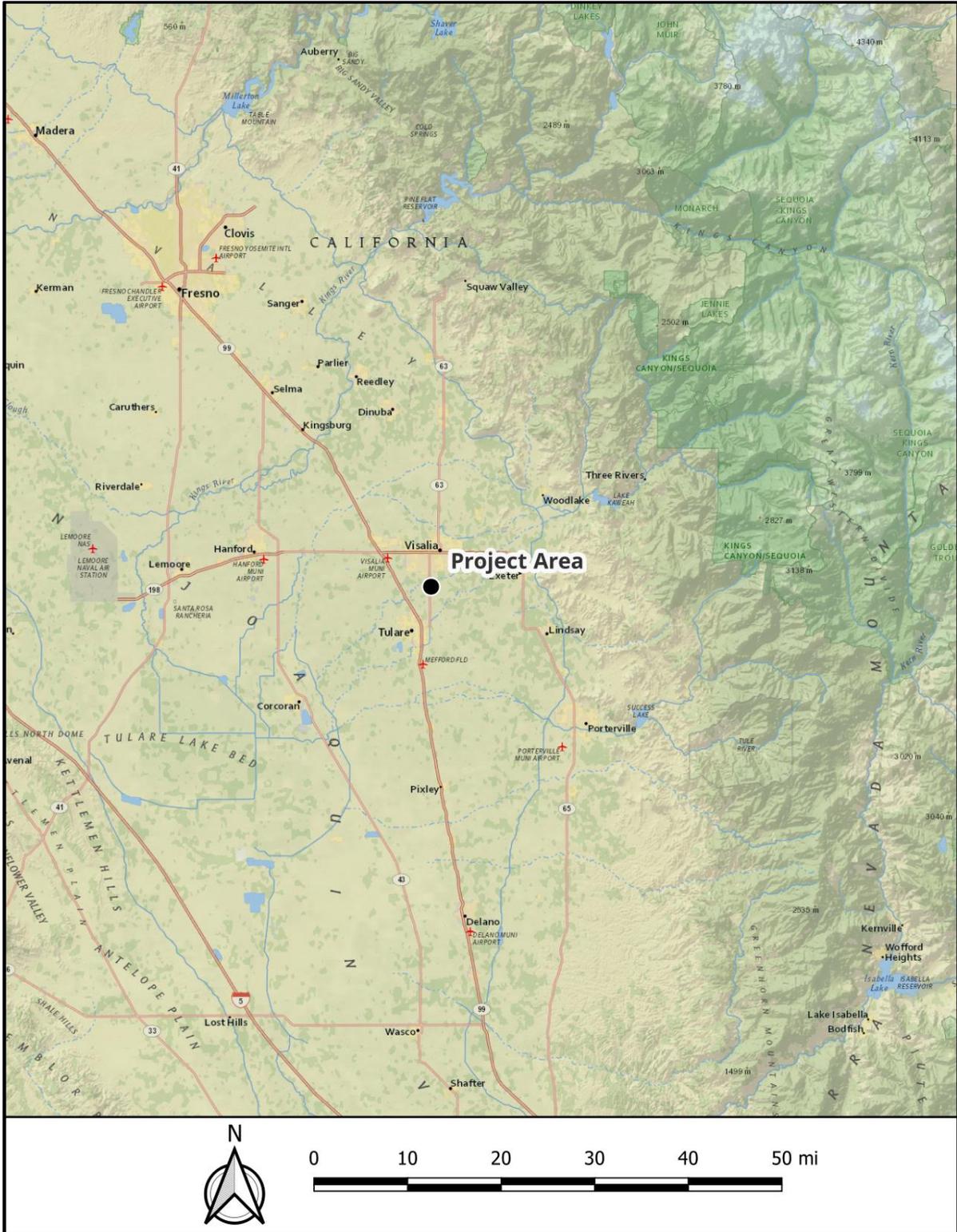


Figure 1-1 Project vicinity in Tulare County, California.

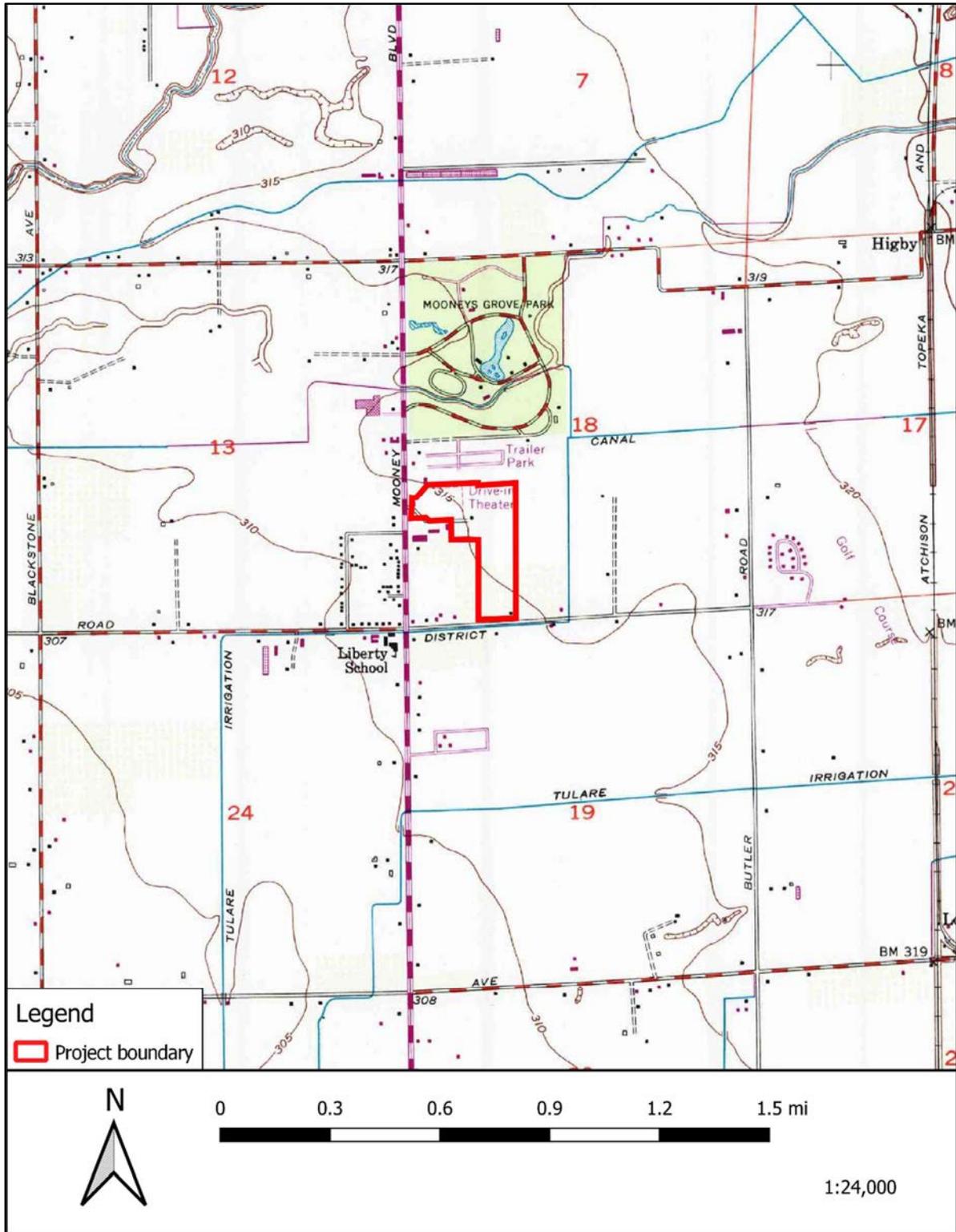
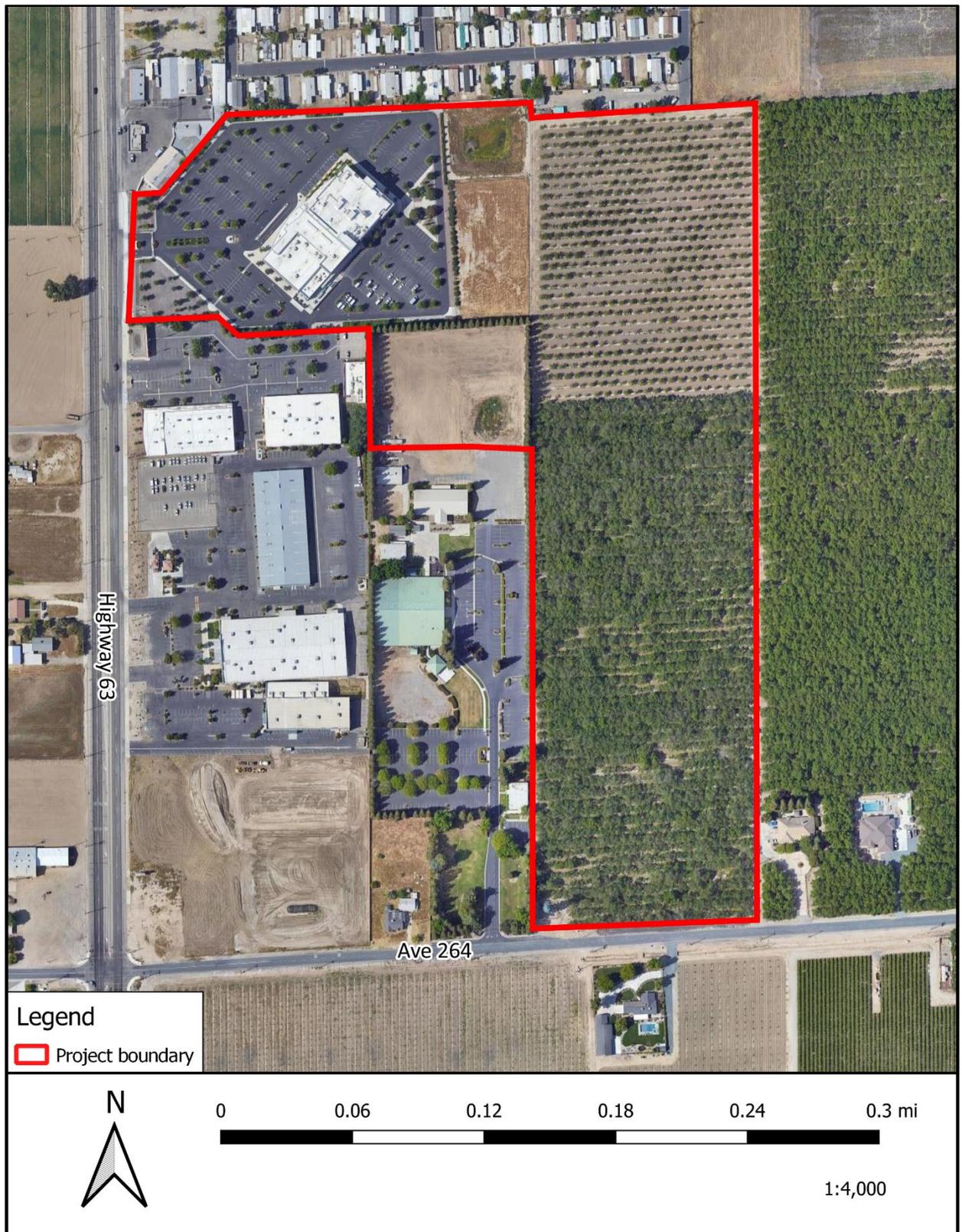


Figure 1-2 Project location on the USGS Visalia, CA 7.5-minute quadrangle.



**Figure 1-3 Aerial view of the Project boundary.**

## 1.4 REPORT STRUCTURE

This report documents the results of a cultural resource assessment of the proposed Project area. In order to comply with California regulations for CEQA, the following specific tasks were completed: (1) requesting a records search from the Southern San Joaquin Information Center (SSJVIC) of the California Historical Resources Information System (CHRIS), at California State University, Bakersfield; (2) a review of site archives (3) requesting a Sacred Lands File Search and a list of interested parties from the Native American Heritage Commission (NAHC) (4) conducting an archaeological pedestrian survey, and (5) preparing this technical report.

Taylor Archaeology prepared this report following the California Office of Historic Preservation standards in the 1990 Archaeological Resources Management Report Recommended Contents and Format. Chapter 1 describes the introduction of the Project and its location and identifies the key personnel involved in this report. Chapter 2 summarizes the Project setting, including the natural, prehistoric ethnography, and historic background for the Project site and surrounding area. Chapter 3 details the methods used for cultural records searches, local Native American outreach, and archaeological pedestrian survey. Chapter 4 summarizes the results of the cultural resource investigation. Chapter 5 discusses the Project findings and offers management recommendations. Chapter 6 is a bibliography of references cited within this report. The report also contains the following appendices: qualifications of key personnel (Appendix A), the CHRIS records search results (Appendix B), and Sacred Lands File search results (Appendix C).

## 2 PROJECT SETTING

### 2.1 NATURAL ENVIRONMENT

The Project area lies in the Central Valley of California, which is approximately 450 miles from north to south, and ranges in width east to west from 40 to 60 miles (Prothero 2017). The Central Valley is divided into two subunits, the Sacramento Valley in the north and the San Joaquin Valley in the south, which are each named after the primary rivers within each valley (Madden 2020). The Project is located approximately 305 feet above sea level on the open flat plains of the Southern San Joaquin Valley. Climate within the San Joaquin valley is classified as a ‘hot Mediterranean climate’, with hot and dry summers, and cool damp winters characterized by periods of dense fog known as ‘tule fog’ (Prothero 2017).

The San Joaquin Valley is a comprised of a structural trough created approximately 65 million years ago and is filled with nearly six miles of sediment (Bull 1964). The San Joaquin Valley ranges from Stockton and the San Joaquin-Sacramento River Delta in the north to Wheeler Ridge to the south, ranging nearly 60 miles wide at its widest (Zack 2017). It is split by late Pleistocene alluvial fans between the San Joaquin River hydrologic area in the north and the Tulare Lake Drainage Basin in the south (Rosenthal et al 2007). The Project site is located within the latter of the two hydrologic units. The Kaweah, Tule, Kern, and Kings rivers flowed into large inland lakes with no outflow except in high flood events, in which the lakes would flow through the Fresno Slough into the San Joaquin River. The largest of these inland lakes was Tulare Lake, which occupied a vast area of Tulare and Kings Counties and was the largest freshwater lake west of the Mississippi. These four rivers in the Tulare Lake Drainage Basin accounted for more than 95 percent of water discharged into Tulare Lake, with the remaining five percent sourced from small drainages originating in the Coast Ranges to the west (Adams et al. 2015).

The Project is in central western Tulare County on the valley floor of the San Joaquin Valley within the greater Kaweah River Delta alluvial fan. Specifically, the Project is located on a former bank of Mill Creek, which is a tributary of the Kaweah River (Hammond 1885). Tributaries form when debris-laden river waters meet abrupt changes in channel and slope confinement, resulting in unstable channel networks that change with time (Wagner et al. 2013).

Before the appearance of agriculture in the nineteenth century, the general Project location would have been comprised of prairie grasslands with scattered oak tree savannas near the foothills, and riparian forest along the various streams and drainages (Preston 1981).

Riparian environments would also have been present along various waterways, including drainages and marshes. Riparian forest vegetation would have been comprised of multiple layers of dense undergrowth. The upper canopy species would have consisted of Western sycamore (*Platanus racemosa*), willow (*Salix* spp.), valley oak (*Quercus lobata*), and Fremont cottonwood (*Populus fremonti*) (Katibah 1984). Intermediate layers were likely dominated by Oregon ash (*Fraxinus latifolia*), willow (*Salix* spp.), and California box elder (*Acer negundo* subsp. *californicum*), while riparian forest undergrowth would have included California wild grape (*Vitis*

*californica*), poison oak (*Rhus diversiloba*), California mugwort (*Artemisia douglasiana*), California wild rose (*Rosa californica*), and blackberry (*Rubus* spp.) Drier portions of the southern end of the San Joaquin Valley would have been dominated by saltbrush (*Atriplex* spp.) desert. (Katibah 1984).

The region around the Project site and the Saint John's River was largely dominated by annual grasslands in drier upland habitat, and riparian forest, rivers and marshland near waterways. Historically, these habitats provided a lush environment for a variety of animals, including rodents, insects, reptiles, birds and other waterfowl, California grizzly bear (*Ursus arctos californicus*), tule elk (*Cervus canadensis nannodes*), pronghorn (*Antilocapra americana*), mule deer (*Odocoileus hemionus*), American black bear (*Ursus americanus*), and mountain lion (*Puma concolor*) (Preston 1981). Native trees and plants observed in the Project vicinity include various blue, live, and white oaks (*Quercus* spp.), cottonwood (*Populus* spp.), and willow (*Salix* spp.). The introduction of agriculture to the region resulted in large animals being forced out of their habitat. Common land mammals now include coyote (*Canis latrans*), bobcat (*Lynx rufus*), gray fox (*Urocyon cinereoargenteus*), kit fox (*Vulpes macrotis*), and rabbits (*Leporidae* spp.).

Rivers and lakes throughout the valley provide habitat for freshwater fish, including rainbow trout (*Oncorhynchus mykiss*), Sacramento sucker (*Catostomus occidentalis*), and Sacramento perch (*Archoplites interruptus*) (Preston 1981). Chinook salmon (*Oncorhynchus tshawytscha*) were also found throughout the valley, including as far south as the San Joaquin River, and occasionally the Kings River, though it is estimated that chinook salmon have lost as much as 72 percent of their original habitat throughout the Central Valley (Yoshiyama et al. 2001).

Soils in the Project area as mapped by the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) consist of two series - Yette and Tagus series. Most of the Project area is 79.6 percent mapped in Yette sandy loam in alluvium derived from granitic rock sources. Yette soils are distributed on 0 to 5 percent grade alluvial fans and stream terraces (NRCS 2025). The remaining 20.4 percent of the Project area is mapped as Tagus loam, which consists of 0 to 2 percent grade very deep, well drained soils formed in alluvium derived from granitic rock sources and are often found on alluvial fan remnants (NRCS 2025).

## 2.2 PREHISTORIC SETTING

Research into San Joaquin Valley prehistory began in the early 1900s with several archaeological investigations (Rosenthal et al. 2007). The Southern San Joaquin Valley is one of the least understood areas within California due to a lack of well-grounded chronologies for large segments of the valley (Rosenthal et al. 2007). This is largely due to the valley floor being filled with thick alluvial deposits, and from human activity largely disturbing much of the valley floor due to a century and a half of agricultural use (Dillon 2002; Siefken 1999). Mound sites may have occurred as frequently as one every two or three miles along major waterways but studying such mounded occupations sites is difficult as most surface sites have been destroyed (Schenck and Dawson 1929). Much of the early to middle Holocene archaeological sites may be buried as deep as 10 meters due to millennia of erosion and alluvial deposits from the western Sierras (Moratto 1984).

Mass agricultural development has heavily disturbed and changed the landscape of the Southern San Joaquin Valley, from the draining of marshes and the vanishing of the extensive Tulare Lake, known as “Pa’ashi” meaning “Big Water” in the Yokut language, to grading nearly the entire valley for agricultural operations (Garone 2011). These activities have impacted or scattered much of the shallow surface deposits and mounds throughout the valley (Rosenthal et al 2007). Some researchers have suggested that potentially as much as 90 percent of all Central California archaeological sites have been destroyed from these activities (Riddell 2002).

The cultural traits and chronologies which are summarized below are largely based upon information discussed in multiple sources, including Fredrickson (1973, 1974), Garfinkel (2015), McGuire and Garfinkel (1980), Moratto (1984), and Rosenthal et al. (2007). The most recent comprehensive approach to compiling a chronology of the Southern San Joaquin Valley prehistory is by Garfinkel in 2015, which builds off Rosenthal’s 2007 previous work. Both Garfinkel’s and Rosenthal’s chronologies are calculated in years B.C. In the interest of maintaining cohesiveness with modern anthropological research, the dates of these chronologies have been adapted into years before present (B.P.).

The Paleo-Indian Period (13,500-10,600 cal B.P.) was largely represented by ephemeral lake sites which were characterized by atlatl and spear projectile points. Around 14,000 years ago, California was largely a cooler and wetter place, but with the retreat of continental Pleistocene glaciers, California largely experienced a warming and drying period. Lakes filled with glacial meltwater were located in the valley floor and used by populations of now extinct large game animals. A few prehistoric sites were discovered near the southwestern shore of Tulare Lake (Garfinkel 2015). Foragers appear to have operated in small groups which migrated on a regular basis.

During the Lower Archaic Period (10,500-7450 cal B.P.), climate change created a largely different environment which led to the creation of larger alluvial fans and flood plains. Most of the archaeological records of the prior period wound up being buried by geological processes. During this time, cultural patterns appear to have emerged between the foothill and valley populations of the local people. The foothill sites were often categorized by dense flaked and ground stone assemblages, while the valley sites were instead characterized by a predominance of crescents and stemmed projectile points. Occupation within the area is represented mostly by isolated discoveries and along the former shoreline of Tulare Lake. Archaeological finds are typically characterized by chipped stone crescents, stemmed points, and other distinctive flakes stone artifacts (Rosenthal et al. 2007). Variations in consumption patterns emerged as well, with the valley sites more marked by consumption of waterfowl, mussels, and freshwater fish, while the foothills sites saw an increase in nuts, seeds, and a more narrowly focused diet than the valley sites.

The Middle Archaic (7450-2500 cal B.P.) saw an increase in semi-permanent villages along river and creek settings, with more permanent sites located along lakes with a more stable supply of water and wildlife. Due to the warmer and drier weather of this period, many lakes within the valley dramatically reduced in size, while some vanished completely (Garone 2011). Cultural

patterns during this time saw an increase in stone tools, while a growth in shell beads, ornaments, and obsidian evidence an extensive and ever-growing long-distance trade network. Little is known of cultural patterns in the valley during the Upper Archaic (2500-850 B.P.), but large village structures appeared to be more common around local rivers. An overall reduction of projectile point size suggests changing bow and arrow technologies. Finally, the Emergent Period (850 cal B.P. - Historic Era) was generally marked by an ever-increasing specialization in tools, and the bow and arrow generally replaced the dominance of the dart and atlatl. Cultural traditions ancestral to those recorded during ethnographic research in the early 1900s are identifiable.

### 2.3 ETHNOGRAPHY

The Project boundary is in the Southern Valley Yokuts ethnographic territory of the San Joaquin Valley. The Yokuts were generally divided into three major groups, the Northern Valley Yokuts, the Southern Valley Yokuts, and the Foothill Yokuts. The Yokuts are a sub-group of the Penutian language that covers much of coastal and central California and Oregon (Callaghan 1958). The Yokuts language contained multiple dialects spoken throughout the region, though many of them were mutually understandable (Merriam 1904).

The Yokuts have been extensively researched and recorded by ethnographers, including Powers (1877), Kroeber (1925), Gifford and Schenck (1926, 1929), Gayton (1930, 1945), Driver (1937), Harrington (1957), Latta (1977), and Wallace (1978). Much of the research from these ethnographers focuses on the central Yokuts tribes due to the northernmost tribes being impacted by Euro-Americans during the California Gold Rush of the mid 1800s, and by the southernmost tribes often being removed and relocated by the Spanish to various Bay Area or coastal missions. The central Yokuts tribes, and especially the western Sierra Nevada foothill tribes, were the most intact at the time of ethnographic study.

The most detailed ethnographic information gathered regarding Native American group territories in Central California is located within maps prepared by Kroeber. The information presented in Kroeber's map of Southern and Central Yokuts shows the Project area within the Telamni Yokuts territory (1925: Plate 47). The main ethnographic village for this area was *Waitatahulul*, which was approximately 3 miles to the northwest of the Project boundary along Packwood Creek (Kroeber 1925). Primary Yokuts villages were typically located along lakeshores and major stream courses, with scattered secondary or temporary camps and settlements located near gathering areas in the foothills. Yokuts were organized into local tribes, with one or more linked villages and smaller settlements within a territory (Kroeber 1925).

Each local tribe was a land-owning group that was organized around a central village and shared common territory and ancestry. Most local tribe populations ranged from 150 to 500 people (Kroeber 1925). These local tribes were often led by a chief, who was often advised by a variety of assistants including the winatum, who served as a messenger and assistant chief (Gayton 1930). Early studies by Kroeber (1925), Gifford and Schenck (1926), and Gayton (1930) concluded that social and political authority within local tribes was derived from male lineage and patriarchy. However, more recent reexaminations (Dick-Bissonnette 1998) argue that this

assumption of patriarchal organization was based on male bias by early 20<sup>th</sup> century researchers, and instead Yokuts sociopolitical authority was matriarchal in nature and centered around matrilineal use-rights and women's work groups.

Prior to Euro-American contact, there was abundance of natural resources within the greater Tulare Lake area. Due to these resources, Yokuts maintained some of the largest populations in North America west of the continental divide (Cook 1955a).

## **2.4 HISTORIC SETTING**

### **2.4.1 California History**

European contact in modern-day California first occurred in 1542 with the arrival of a Spanish expedition lead by Juan Rodríguez Cabrillo into San Diego Bay (Engstrand 1997). Expeditions along the California coast continued throughout the sixteenth century and primarily focused on finding favorable harbors for further expansion and trade across the Pacific. However, rocky shorelines, unfavorable currents, and wind conditions made traveling north from New Spain to the upper California coast a difficult and time-consuming journey (Eifler 2017). The topography of California, with high mountains, large deserts, and few natural harbors lead to European expansion into California only starting in the 1760s. As British and Russian expansion through fur trading encroached on California from the north, Spain established a system of presidios, pueblos, and missions along the California coast to defend its claim, starting with Mission San Diego de Alcalá in 1769 (Engstrand 1997).

### **2.4.2 Central California History**

The San Joaquin Valley did not experience contact with Europeans until the late 1700s (Starr 2007). Life at the California missions was hard and brutal for Native Americans, with many dying of disease, poor conditions, and many fleeing to areas not under direct Spanish control (Jackson and Castillo 1995). The earliest exploration of the San Joaquin Valley by Europeans was likely by the Spaniards when in the fall of 1772 a group known as the Catalanian Volunteers entered the valley through Tejon Pass in search of deserters from the Southern California Missions (Zack 2017). However, the group only made it as far north as Buena Vista Lake in modern day Kern County before turning around due to the extensive swamps. Additional excursions to the valley were for exploration such as those led by Lieutenant Bariel Moraga in 1806, but also to find sites for suitable mission sites and to track down Native Americans fleeing the coastal missions (Cook 1958).

Subsequent expeditions were also sent to pursue outlaws from the coast who would often flee to the valley for safety. One of the subsequent explorations was an expedition in 1814 to 1815 with Sargent Juan Ortega and Father Juan Cabot, who left the Mission San Miguel with a company of approximately 30 Spanish soldiers and explored the San Joaquin Valley (Smith 2004). This expedition passed through the Kaweah Delta and modern-day Visalia and made a recommendation to establish a mission near modern-day Visalia. However, with European

contact also came European disease. Malaria and other new diseases were brought by Europeans, and in 1833 an epidemic of unknown origin traveled throughout the Central Valley. Some estimates place the Native American mortality of the epidemic as high as 75 percent (Cook 1955b). Combined with the rapid expansion of Americans into California in 1848 during the Gold Rush, Native American populations within the valley never fully recovered (Eifler 2017).

Initial settlement within the valley by Europeans in the 1830s was largely either by trappers like Jedediah Smith or horse thieves like Pegleg Smith (Clough and Secrest 1984). In fact, horse and other livestock theft was so rampant that ranching operations on the Rancho Laguna de Tache by the Kings River and Rancho del San Joaquin Rancho along the San Joaquin River could not be properly established (Cook 1962). With the end of the Mexican American War and the beginning of the gold rush in 1848, the San Joaquin Valley became more populated with ranchers and prospectors. Most prospectors traveled by sea to San Francisco and used rivers ranging from the Sacramento River to the San Joaquin River to access the California interior (Eifler 2017). Most areas south of the San Joaquin River were less settled simply because those rivers did not connect to the San Francisco Bay area except in wet flood years. By 1850, California became a state and Tulare County was established in 1853.

### **2.4.3 Local History**

The City of Visalia is one of the oldest cities within the Southern San Joaquin Valley and was founded in 1852. By the late 1850s the town of Visalia was a major station along the Butterfield Overland Mail stage route as it traveled north from Los Angeles to Stockton (Helmich 2008). During the first few decades, Visalia was a supply center for nearby gold rushes, served as the regional population center of Tulare County, and had an agricultural economy based on livestock and some agriculture (Dyett and Bhatia 2014). During the 1850s and 1860s roughly made earthen ditches and dams diverted stream water for irrigation, with the earliest ditches in the San Joaquin Valley being constructed in Visalia between 1852 to 1853 (Caltrans 2000). The Southern Pacific Railroad was extended from Fresno into Tulare County in the early 1870s but bypassed the City of Visalia as the city was located six miles to the east of the rail line (Small 1926).

The construction of the rail line also brought an increase in agriculture and farms, which clashed with existing ranching operations in the local area. Escalating conflicts and livestock disputes between ranchers and farmers lead to the “No Fence Law” in 1874, which forced ranchers to pay for crop and property damage caused by their cattle (Ludeke 1980). With the passage of this law and the expansion of irrigation systems, predominant land use in the 1870s switched from grazing to farming (Mitchell 1974). This led to the beginning of the vast change of the San Joaquin Valley from native vegetation and grasslands to irrigated crops (Varner and Stuart 1975).

Water rights within California originally arose from the ‘first come first serve’ policy of the Gold Rush era. Diverting surface water to farms became big business but was a convoluted mess of customs, traditions, and conflicting claims (Zack 2017). Fed up with the situation, small farmers gathered behind Modesto lawyer C.C. Wright, who was elected to the California legislature in 1887 on the platform of taking water rights from large estates and putting it in the power of

community-controlled irrigation districts (Hundley 1992). To solve this mess, the Wright Act of 1887 was passed that allowed residents to petition a local county board of supervisors to create irrigation districts that had the power to issue bonds, and tax land within the district boundaries to pay for the creation and maintenance of canals and ditches for irrigation purposes.

## **3 METHODS**

### **3.1 RECORDS SEARCH**

Taylorred Archaeology requested a cultural resource records search from the SSJVIC of the CHRIS at California State University in Bakersfield, California on September 15, 2025. The purpose of this request was to identify and review prior cultural resource studies and previously recorded cultural resources on or near the Project boundary. The records search included prior cultural resources investigation reports conducted, previously recorded resources within the Project boundary and the 0.5-mile radius around the Project boundary (Appendix B). Also included in research were cultural resource records (DPR forms) as well as the Historic Properties Directory of the Office of Historic Preservation list, General Land Office Maps, Archaeological Determinations of Eligibility list, and the California Inventory of Historic Resources list.

### **3.2 ARCHIVAL RESEARCH**

Archival research was conducted to investigate the historical background for any potential historic structures, buildings and historical deposits that may exist and land use within the Project boundary. Historical maps, historical aerial photographs, historical US Geological Survey (USGS) topographic maps, Google Earth aerial photographs, Google Street View photos, Map Aerial Locator Tool (MALT) at the Henry Madden Library, California State University, Fresno, books, articles and other records were used to better understand the prehistory and history of the Project area. The results of this research are presented in Chapter 4.

### **3.3 NAHC SACRED LANDS FILE**

Taylorred Archaeology sent a request to the NAHC as part of this cultural resources investigation for a Sacred Lands File (SLF) search on September 15, 2025. The objective of the SLF search was to identify tribal cultural resources present in or near the Project boundary.

Native American outreach and consultation with Tribes are not included in this scope of work. It is assumed that government-to-government consultation under Assembly Bill (AB) 52 will be conducted by the CEQA lead agency. The SLF results are in Chapter 4.

### **3.4 ARCHAEOLOGICAL PEDESTRIAN SURVEY**

On October 4, 2025, Archaeologist Consuelo Sauls conducted an archaeological pedestrian survey of the 57.4-acre Project site. The survey began in the southeast corner of the Project boundary, using transects spaced 5 meters apart oriented east to west. The archaeologist carefully inspected all exposed ground surface and rodent burrow back-dirt piles and other areas of bare earth for soil discoloration that could indicate the presence of artifacts (e.g., lithics and ceramic sherds), soil depressions, and features indicating the former presence of buildings or structures (e.g., postholes and foundations). The Project boundary was checked for both

prehistoric deposits and historic-age features, structures, and artifacts more than 50 years old that may be present on the ground surface. A plan map of the Project site was used to see land usage, structures and map out transects. Field survey observations were documented in the field and survey coordinates were recorded on a Gaia Global Positioning System application. Photographs were taken of the Project site using an iPhone 11 Pro digital camera.

## 4 RESULTS

### 4.1 RECORDS SEARCH

The SSJVIC provided the records search results in a letter dated September 30, 2025 (Appendix B). According to the search results, three prior cultural resource studies were conducted within the Project area (Table 4-1). Further review of these studies showed that only one overlaps the Project site. TU-01747 is an archaeological field survey for a proposed cellular tower. TU-00041 TU-01190 is a historical account of the Mariposa War of 1850-1851 and is not pertinent to this Project area. In addition, four previous cultural resources studies were within a 0.5-mile radius of the Project boundary as depicted in Table 4-2. None of these studies intersected the Project boundary.

The SSJVIC reported there were no cultural resources previously documented within the Project area. Two cultural resources, both historic era, were recorded within a 0.5-mile radius of the Project boundary (Table 4-3). None of these previously recorded resources intercept the Project boundary. P-54-005296 is the historic era Tulare Irrigation Canal, located on the south side of Avenue 264. TUL-PRO-007 is a 1915 historic era bridge in Mooney Grove Park approximately 0.25 miles north of the Project site.

**Table 4-1  
Previous Cultural Resources Studies within the Project Area**

Report Number	Author(s)	Date	Report Title	Study
<b>TU-00041</b>	William Self	1995	Class I Overview, Santa Fe Pacific Pipeline Partners, L.P., Proposed Concord to Colton Pipeline Project	Archaeological Field Survey
<b>TU-01190</b>	Annie R. Mitchell	1957	Jim Savage and the Tulareño Indians	Book
<b>TU-01747</b>	Phil Fulton	2015	Cultural Resource Assessment Class III Inventory, Verizon Wireless Services, South Mooney Facility, City of Visalia, County of Tulare, California	Archaeological Field Survey

**Table 4-2**  
**Previous Cultural Resources Studies within 0.5-mile of the Project Area**

Report Number	Author(s)	Date	Report Title	Study
TU-00534	Ann S. Peak, Robert Gerry, Peter D. Robert and Francis A. Riddell	1975	Archaeological Assessment of Cultural Resources-Mid-Valley Canal Project in Fresno, Tulare, Merced, Madera, and Kings Counties, California.	Archaeological Field Survey
TU-00620	Brian Wickstrom	1996	Negative Archaeological Survey Report for the Bus Bay Construction Proposition On the East Side of Route 63 at Mooney's Grove Park In Visalia	Archaeological Field Survey
TU-01085	Douglas W. Dodd	1999	Historical Architectural Survey Report/Historic Resource Evaluation Report for Roadbed Rehabilitation and Intersection Upgrades on State Route 63 Between Tulare and Visalia, Tulare County	Architectural/Historical Evaluation
TU-01498	Laura Leach-Palm, Paul Brandy, Jay King, Pat Mikkelsen, Libby Seil, Lindsay Hartman, Jill Bradeen	2010	Cultural Resources Inventory of Caltrans District 6 Rural Conventional Highways in Fresno, Western Kern, Kings, Madera, and Tulare Counties.	Archaeological, Architectural/Historical Field Survey

**Table 4-3**  
**Previously Recorded Cultural Resources within 0.5-mile radius of the Project Area**

Resource Number	Age Association	Resource Type	Year Recorded	Distance from Project Boundary
P-54-005296	Historic	Structure; Tulare Irrigation Canal	2022 (Karana Hattersley-Drayton)	60 feet south
TUL-PRO-007/ OTIS ID 507107	Historic	Structure; The Mooney Park Bridge	1986 (Caltrans)	0.25 miles north

## 4.2 ARCHIVAL RESEARCH

Historic map coverage of the Project site begins with a 1927 USGS topographic map, which depicts the site as open field bound by an unnamed road to the west in the same alignment as present-day Highway 63, and a “Liberty Road” to the south in the same alignment as Avenue 264

Phase I Cultural Resources Assessment for the Tulare County Office of Education Administration and Conference Center Expansion Project

(USGS 1927). No buildings or structures are depicted on the Project site in 1927. By 1949 the southern half of the Project site is shown as an orchard with three buildings on the Project site, one in the southeast corner along Avenue 264, one in the center northern portion of the site, and one along the western boundary of the site along Highway 63. A small road is also depicted along the southwestern boundary of the Project site from Highway 63 to the central building (USGS 1947). By 1969, the northwestern portion of the project site is labeled as “Drive-in Theater” in the area presently occupied by the TCOE administration building and parking lot (USGS 1969). Otherwise the site is similar to the 1949 USGS topographic site. USGS Topographic maps after 1969 for the Project site do not depict any details other than Highway 63 to the west and Avenue 264 to the south.

Available historic aerial photograph coverage of the Project site began in 1946 with historic aerial photographs by the United State Agricultural Adjustment Administration (USAAA), which depicts the Project site in similar configuration to the 1947 USGS topographic map (USAAA 1946). The next available historic aerial photograph dates to 1956, which shows the northwest corner of the Project site occupied by a drive-in movie theater in a similar configuration to the one depicted in the 1969 topographic map (NETROnline 2025). The remainder of the Project site is comprised of an agricultural field in the northern half and an orchard with a rural residence in the southern half. The rural residence appears to have been removed sometime between 1984 and 1994, and the movie theater appears to have been demolished sometime between 2005 to 2009 (Google Earth 2025). The TCOE Administration building appears to have been constructed in 2015 and the orchard in the eastern portion of the Project site in early 2025 (Google Earth 2025).

### **4.3 NATIVE AMERICAN OUTREACH**

The NAHC responded on June 17, 2025 (Appendix C). The search results of the SLF were negative for the presence of tribal cultural resources within the Project area. The NAHC provided a contact list of Native American tribes who may have knowledge of cultural resources in the Project area (Appendix C).

### **4.4 ARCHAEOLOGICAL SURVEY RESULTS**

The Project site consisted of a fully developed commercial area with a parking lot, two small basins, open field, and a recently removed orchard at Assessor’s Parcel Numbers 122-470-003, 122-480-004 and 122-480-008 (Figure 4-1). The fenced basin areas in 122-480-008 and the northeast portion of 122-480-004 were not accessible (Figures 4-2 and 4-3). Most of the development area in APN 122-480-004 is landscaped with ornamental bushes and paved parking lots. In the east portion of the parcel was mostly dirt and appeared to be used as a parking lot.

The natural topography of the Project site has been altered by historical and modern agricultural practices and commercial development and much of the land on the Project site has been graded, plowed, planted and/or harvested, which has caused additional disturbance to the soil.

The ground surface visibility within the Project boundary was mostly excellent (100 percent) in the open field and the dirt lot behind the parking lot (Figure 4-4). Ground visibility in the developed commercial area was generally the poorest (0-30 percent) where most of the ground was covered in asphalt (Figure 4-5). The soil in the Project boundary consisted of alluvial sandy loam and was grayish brown and appeared highly disturbed by historical and modern land-use practices, including infrastructural development. Ground disturbances, such as burrows and soil piles, were visually inspected.

No cultural resources were encountered within the Project boundary. While past agricultural and development activities may have potentially destroyed or obscured ground surface evidence of archaeological resources within the Project site, intact archaeological resources may potentially exist below the ground surface.

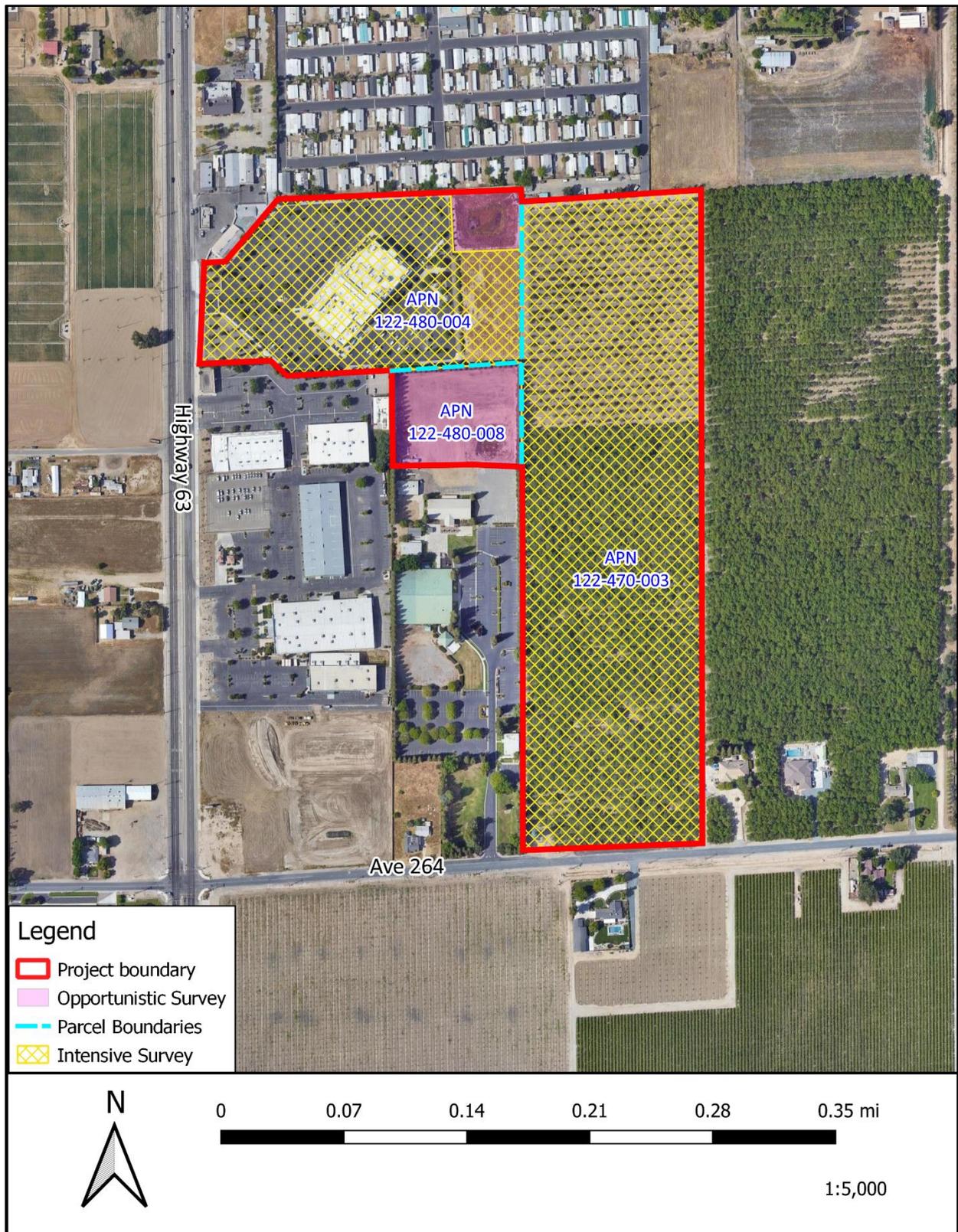


Figure 4-1 Survey coverage of Project site.



**Figure 4-2 Basin in northern central portion of Project site, facing northwest.**



**Figure 4-3 Basin and dirt parking lot in central portion of Project site, facing south.**



**Figure 4-4 Eastern portion of Project site, facing north.**



**Figure 4-5 Commercial area of Project site, facing northwest.**

## 5

### SUMMARY AND RECOMMENDATION

Taylor Archaeology performed a Phase I Cultural Resources Assessment for the Tulare County Office of Education Administration and Conference Center Expansion Project. The Project proposes to expand and redevelop its existing Administration and Conference Building site. The eastern portion of the Project site will also be annexed into the City of Visalia. This assessment consisted of a records search from the SSJVIC, archival research to gather background information on the site, Sacred Lands File search results, and a pedestrian survey. Furthermore, an examination of historic topographic maps and aerial images indicates that the Project site has largely been used for agricultural purposes.

The CHRIS records search results of the Project site and a 0.5-mile radius was conducted through the SSJVIC at CSU Bakersfield, California. The results determined that three previous cultural studies have been conducted within the Project area. Only one of them overlap the Project boundary. Four prior cultural resources studies were conducted within a 0.5-mile radius. The CHRIS records search did not identify any previously recorded cultural resources within the Project boundary and two cultural resources were recorded within a 0.5-mile radius.

The NAHC search of the SLF was negative for tribal cultural resources. Native American outreach and consultation with Tribes are not included in this investigation. It is assumed that government-to-government consultation under Assembly Bill (AB) 52 will be conducted by Tulare County.

An intensive pedestrian survey did not identify any cultural resources on the ground surface within the Project boundary. The absence of cultural material on the ground surface does not, however, preclude the possibility of Project construction unearthing buried archaeological deposits. The proposed work will not impact the cultural resources within the Project area.

Based on the results of this investigation, Taylor Archaeology recommends the following best management practices:

- In the event that previously unidentified archaeological materials are encountered during development or ground-moving activities in the Project boundary, all work should be halted in the immediate vicinity (100 feet) until a qualified archaeologist can identify the discovery and assess its significance.
- If human remains are uncovered during construction, the Tulare County Coroner is to be notified to investigate the remains and arrange proper treatment and disposition. If the remains are identified on the basis of archaeological context, age, cultural associations, or biological traits to be those of a Native American, California Health and Safety Code 7050.5 and PRC 5097.98 require that the coroner notify the NAHC within 24 hours of discovery. The NAHC will then identify the Most Likely Descendent who will be afforded

an opportunity to make recommendations regarding the treatment and disposition of the remains.

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## **APPENDIX A**

### **Personnel Qualifications**

### Areas of Expertise

- Cultural Resource Management
- CEQA and Federal regulations
- Prehistoric Archaeology
- Laboratory Management
- Technical Writing
- Phase I Assessments

### Years of Experience

- 17

### Education

- M.A., Archaeology, University of Durham, 2014
- B.A., Anthropology, California State University, Fresno, 2009

### Registrations/Certifications

- Registered Professional Archaeologist 41591505

### Professional Affiliations

- Coalition for Diversity in California Archaeology
- Society for American Archaeology
- Society for California Archaeology
- Society of Black Archaeologists

### Professional Experience

- 2019 – Present Principal Investigator, Taylored Archaeology, Fresno, California
- 2018 – 2019 Staff Archaeologist, Applied EarthWorks, Inc., Fresno, California
- 2016 – 2018 Principal Investigator, Soar Environmental Consulting, Inc., Fresno, California
- 2015 Archivist/Database Technician, Development and Conservation Management, Inc., Laguna Beach, California
- 2013 Laboratory Research Assistant, Durham University Archaeology Department and Archaeology Museum, Durham, England, UK
- 2011 – 2012 Laboratory Technician, University of Pennsylvania Museum of Archaeology and Anthropology, Philadelphia, Pennsylvania
- 2008 – 2009 Laboratory Technician, California State University, Fresno
- 2008 Field School, California State University, Fresno

### Technical Qualifications

Ms. Sauls meets the Secretary of the Interior's Professional Qualification Standards as an archaeologist. She has conducted pedestrian surveys, supervised Extended Phase I survey, authored technical reports, and completed the Section 106 process with the State Historic Preservation Officer and Tribal Historic Preservation Officer. Her experience includes data recovery excavation at Western Mono sites and processing recovered artifacts in the laboratory as well as conducting archival research about prehistory and ethnography of Central California. Ms. Sauls has authored and contributed to technical and letter reports in compliance with of the National Historical Preservation Act (NHPA) Section 106 and the California Environmental Quality Act (CEQA). She also has supported NHPA tribal consultation and responded to Assembly Bill 52 tribal comments. Ms. Sauls also has an extensive background supervising laboratory processing, cataloging, and conservation of prehistoric and historical archaeological collections. In addition, she worked with the Rock Art Heritage Group in the management, preservation, and presentation of rock art in museums throughout England, including a thorough analysis of the British Museum's rock art collections. At Durham University Archaeology Museum, Ms. Sauls processed the excavated skeletal remains of 30 individuals from the seventeenth century.

## **APPENDIX B**

### **Records Search Results**



9/30/2025

Consuelo Sauls  
Taylored Archaeology  
6083 N. Figarden Drive, Suite 616  
Fresno, CA 93722

Re: Tulare County Education Project  
Records Search File No.: 25-385

The Southern San Joaquin Valley Information Center received your record search request for the project area referenced above, located on Visalia USGS 7.5' quad. The following reflects the results of the records search for the project area and the 0.5 mile radius:

As indicated on the data request form, the locations of resources and reports are provided in the following format:  Custom GIS Maps  GIS Data  Hand Drawn Maps (Inyo County Only)

Resources within project area:	None
Resources within 0.5 mile radius:	P-54-005296, TUL-PRO-007
Reports within project area:	TU-00041, 01190, 01747
Reports within 0.5 mile radius:	TU-00534, 00620, 01085, 01498

- Resource Database Printout (list):**  enclosed  not requested  nothing listed
- Resource Database Printout (details):**  enclosed  not requested  nothing listed
- Resource Digital Database Records:**  enclosed  not requested  nothing listed
- Report Database Printout (list):**  enclosed  not requested  nothing listed
- Report Database Printout (details):**  enclosed  not requested  nothing listed
- Report Digital Database Records:**  enclosed  not requested  nothing listed
- Resource Record Copies:**  enclosed  not requested  nothing listed
- Report Copies:**  enclosed  not requested  nothing listed
- OHP Built Environment Resources Directory:**  enclosed  not requested  nothing listed
- Archaeological Determinations of Eligibility:**  enclosed  not requested  nothing listed
- CA Inventory of Historic Resources (1976):**  enclosed  not requested  nothing listed

**Caltrans Bridge Survey:** Not available at SSJVIC; please see  
<https://dot.ca.gov/programs/environmental-analysis/cultural-studies/california-historical-bridges-tunnels>

**Ethnographic Information:** Not available at SSJVIC

**Historical Literature:** Not available at SSJVIC

**Historical Maps:** Not available at SSJVIC; please see  
<http://historicalmaps.arcgis.com/usgs/>

**Local Inventories:** Not available at SSJVIC

**GLO and/or Rancho Plat Maps:** Not available at SSJVIC; please see  
<http://www.glorerecords.blm.gov/search/default.aspx#searchTabIndex=0&searchByTypeIndex=1> and/or  
<http://www.oac.cdlib.org/view?docId=hb8489p15p;developer=local;style=oac4;doc.view=items>

**Shipwreck Inventory:** Not available at SSJVIC; please see  
<https://www.slc.ca.gov/shipwrecks/>

**Soil Survey Maps:** Not available at SSJVIC; please see  
<http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

Please forward a copy of any resulting reports from this project to the office as soon as possible. Due to the sensitive nature of archaeological site location data, we ask that you do not include resource location maps and resource location descriptions in your report if the report is for public distribution. If you have any questions regarding the results presented herein, please contact the office at the phone number listed above.

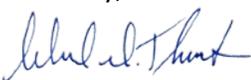
The provision of CHRIS Data via this records search response does not in any way constitute public disclosure of records otherwise exempt from disclosure under the California Public Records Act or any other law, including, but not limited to, records related to archeological site information maintained by or on behalf of, or in the possession of, the State of California, Department of Parks and Recreation, State Historic Preservation Officer, Office of Historic Preservation, or the State Historical Resources Commission.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the CHRIS Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

Should you require any additional information for the above referenced project, reference the record search number listed above when making inquiries. Invoices for Information Center services will be sent under separate cover from the California State University, Bakersfield Accounting Office.

Thank you for using the California Historical Resources Information System (CHRIS).

Sincerely,



Celeste M. Thomson  
Coordinator

## **APPENDIX C**

### **Sacred Lands File Search Results**

## NATIVE AMERICAN HERITAGE COMMISSION

September 16, 2025

Consuelo Sauls  
Taylored ArchaeologyVia Email to: [csaulsarchaeo@gmail.com](mailto:csaulsarchaeo@gmail.com)

Re: Tulare County Education Project, Tulare County

To Whom It May Concern:

As requested, a search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed based on information submitted for the above referenced project. The results were negative. Be aware that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, an SLF search is not a substitute for consultation with all tribes that are traditionally and culturally affiliated with a project's geographic area.

Attached is a list of Native American tribes that are traditionally and culturally affiliated with the project's geographic area. Please contact all of the listed tribes as they may have information about sacred sites within the project area that is not listed with the NAHC.

If within two weeks of notification, a response has not been received, the Commission requests that you follow up with a telephone call or email to ensure that the project information was received.

If you receive notification of a change of address or phone number from a tribe, please inform the NAHC so that we can assure that our lists contain current information.

In addition to engaging in tribal consultation, you should consult the appropriate regional California Historical Research Information System (CHRIS) information center to determine whether it has information regarding the presence of recorded archaeological sites within the project area.

If you have any questions or need additional information, please contact me at my email address: [melina.carlos@nahc.ca.gov](mailto:melina.carlos@nahc.ca.gov)

Sincerely,

*Melina Carlos*Melina Carlos  
Cultural Resources Analyst

Attachment

CHAIRPERSON  
Reginald Pagaling  
ChumashVICE-CHAIRPERSON  
Buffy McQuillen  
Yokayo Pomo, Yuki,  
NomlakiSECRETARY  
Isaac Bojorquez  
Ohlone-CostanoanPARLIAMENTARIAN  
Wayne Nelson  
LuiseñoCOMMISSIONER  
Sara Dutschke  
MiwokCOMMISSIONER  
Stanley Rodriguez  
KumeyaayCOMMISSIONER  
Bennae Calac  
Pauma-Yuima Band of  
Luiseño IndiansCOMMISSIONER  
VacantCOMMISSIONER  
VacantACTING EXECUTIVE  
SECRETARY  
Michelle CarrNAHC HEADQUARTERS  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)

**Native American Heritage Commission**  
**Native American Contact List**  
**Tulare County**  
**9/16/2025**

County	Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Fax #	Email Address	Cultural Affiliation	Counties	Last Updated
Tulare	Kitanemuk & Yowlumne Tejon Indians	N	Delia Dominguez, Chairperson	115 Radio Street Bakersfield, CA, 93305	(626) 339-6785		2deedominguez@gmail.com	Kitanemuk Southern Valley Yokut	Fresno,Kern,Kings,Los Angeles,Madera,Monterey,San Benito,San Luis Obispo,Tulare	
	Santa Rosa Rancheria Tachi Yokut Tribe	F	Nichole Escalon, Cultural Specialist I	P.O. Box 8 Lemoore, CA, 93245	(559) 924-1278		nescalon@tachi-yokut-nsn.gov	Southern Valley Yokut	Fresno,Kern,Kings,Merced,Monterey,San Benito,San Luis Obispo,Tulare	10/3/2023
	Santa Rosa Rancheria Tachi Yokut Tribe	F	Shana Powers, THPO	P.O. Box 8 Lemoore, CA, 93245	(559) 423-3900			Southern Valley Yokut	Fresno,Kern,Kings,Merced,Monterey,San Benito,San Luis Obispo,Tulare	10/3/2023
	Santa Rosa Rancheria Tachi Yokut Tribe	F	Samantha McCarty, Cultural Specialist II	P.O. Box 8 Lemoore, CA, 93245	(559) 633-3440		smccarty@tachi-yokut-nsn.gov	Southern Valley Yokut	Fresno,Kern,Kings,Merced,Monterey,San Benito,San Luis Obispo,Tulare	10/3/2023
	Table Mountain Rancheria	F	Bob Pennell, Cultural Resource Director	P.O. Box 410 Friant, CA, 93626	(559) 325-0351	(559) 325-0394	rpennell@tmr.org	Yokut	Fresno,Kern,Kings,Madera,Monterey,San Benito,San Luis Obispo,Tulare	
	Table Mountain Rancheria	F	Michelle Heredia-Cordova, Chairperson	P.O. Box 410 Friant, CA, 93626	(559) 822-2587	(559) 822-2693	mhcordova@tmr.org	Yokut	Fresno,Kern,Kings,Madera,Monterey,San Benito,San Luis Obispo,Tulare	12/21/2023
	Tule River Indian Tribe	F	Felix Christman, THPO	340 North Reservation Road Porterville, CA,	(559) 719-0420		felix.christman@tulerivertribe-nsn.gov	Yokut	Alameda,Amador,Calaveras,Contra Costa,Fresno,Inyo,Kern,Kings,Madera,Mariposa,Merced,Monterey,Sacrame	8/12/2025
	Tule River Indian Tribe	F	Kerri Vera, Environmental Department	340 North Reservation Road Porterville, CA,	(559) 781-4271		kerri.vera@tulerivertribe-nsn.gov	Yokut	Alameda,Amador,Calaveras,Contra Costa,Fresno,Inyo,Kern,Kings,Madera,Mariposa,Merced,Monterey,Sacrame	8/12/2025
	Wuksachi Indian Tribe/Eshom Valley Band	N	Kenneth Woodrow, Chairperson	1179 Rock Haven Ct. Salinas, CA, 93906	(831) 443-9702		kwood8934@aol.com	Foothill Yokut Mono	Alameda,Calaveras,Contra Costa,Fresno,Inyo,Kings,Madera,Mariposa,Merced,Mono,Monterey,San Benito,San Francisco,San Joaquin,San Mateo,Santa	6/19/2023

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

Record: PROJ-2025-005166  
Report Type: List of Tribes  
Counties: Tulare  
NAHC Group: All

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Tulare County Education Project, Tulare County.