3 ENVIRONMENTAL CHECKLIST

The environmental factors listed below would be potentially affected by this project, involving at least one impact that is a "potentially significant impact", as discussed further in the analysis within this section:

- Biological Resources

The environmental factors listed below would have no impact or a less than significant impact, , as discussed further in the analysis within this section:

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

DETERMINATION:

On the basis of this initial evaluation:

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.

Signature

9/24/2021

Date

3.2 AESTHETICS

Table 3.1-1. Potential Impacts on Aesthetics

ENVIRONMENTAL ISSUES	ENVIRONMENTAL IMPACT SIGNIFICANCE
I. **Aesthetics.** Except as provided in Public Resources Code Section 21099, would the project:	-
a) Have a substantial adverse effect on a scenic vista?	No Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact
c) 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?	No Impact
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	No Impact

Note: "-" indicates blank cell

a) Have a substantial adverse effect on a scenic vista?

There are no scenic vistas in proximity to the project sites. There would be no impact.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

There are no state scenic highways in proximity to the project sites. There would be no impact.

c) 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?

While the proposed project would involve construction of new facilities at the project sites, the character of the new structures would be compatible with existing infrastructure at the well sites. There are no applicable zoning or other regulations governing scenic quality. There would be no impact.

d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Construction activities would occur during the day and would not require nighttime lighting or other sources of light or glare. Although some additional site security lighting would be installed at the well sites as part of the project, this would be at a similar level to existing lighting and would be directed downward to avoid light spill to adjacent properties. There would be no impact.

3.3 AGRICULTURE AND FORESTRY RESOURCES

Table 3.2-1. Potential Impacts on Agriculture and Forestry Resources

ENVIRONMENTAL ISSUES	ENVIRONMENTAL IMPACT SIGNIFICANCE
II. Agriculture and Forestry Resources. Would the project:	-
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?	No Impact
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	No Impact
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 Timberland Production (as defined by Government Code section 51104(g))?	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact
e) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	No Impact

Note: "-" indicates blank cell

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?

All four well sites are designated as "urban" land within the Farmland Mapping and Monitoring Program maps (California Department of Conservation 2018a). Therefore, there would be no conversion of lands designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland as a result of the proposed project. There would be no impact.

b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

The project sites are not located on lands subject to Williamson Act contracts (County of Fresno 2019a). Although well sites #4 and #6 are zoned for agriculture (AL20 – Limited Agricultural and AE20 – Exclusive Agricultural, respectively), the sites are not currently used for agricultural purposes (County of Fresno 2019b). Both the AL20 and AE20 zoning designations allow for construction of infrastructure (County of Fresno 2018), therefore the proposed project would not conflict with the existing agricultural zoning. There would be no impact.

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 Timberland Production (as defined by Government Code section 51104(g))?

The proposed project sites are not zoned as forest land or timberland (County of Fresno 2019b). There would be no impact.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

The proposed project sites do not contain forest land. There would be no impact.

e) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

As noted above, the project sites are not currently used for agriculture and do not contain forest land. There would be no impact.

3.4 AIR QUALITY

Table 3.3-1. Potential Impacts on Air Quality

ENVIRONMENTAL ISSUES	ENVIRONMENTAL IMPACT SIGNIFICANCE
III. Air Quality. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations. Would the project:	-
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	Less than Significant
c) Expose sensitive receptors to substantial pollutant concentrations?	Less than Significant
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than Significant

Note: "-" indicates blank cell

a) Conflict with or obstruct implementation of the applicable air quality plan?

The San Joaquin Valley Air Pollution Control District (SJVAPCD) regulates and monitors air quality in the Basin. The SJVAPCD has developed air quality plans to attain California and National Ambient Air Quality Standards for ozone and PM, as discussed in more detail in the Air Quality and Greenhouse Gas Emissions memorandum prepared for the project (AECOM 2020). The air quality plans include emissions inventories to measure the sources of air pollutants, to evaluate how well different control methods have worked, and to show how air pollution will be reduced. The currently applicable attainment plans for the San Joaquin Valley Air Basin address ozone, PM_{10}, and $PM_{2.5}$. The air quality plans present comprehensive strategies to reduce emissions from stationary, area, mobile, and indirect sources. Such strategies include the adoption of rules and regulations; enhancement of CEQA participation; implementation of a new and modified indirect-source review program; adoption of local air quality plans; and stationary, mobile, and indirect source control measures. The air quality plans describe air pollution control strategies to be implemented by a city, county, or region. The plans account for projections of population growth and vehicle miles traveled (VMT) provided by the San Joaquin Council of Governments in the San Joaquin Valley Air Basin and identify strategies for bringing

regional emissions into compliance with federal and state air quality standards. Because population growth and projected VMT are the basis of the air quality attainment plan strategies, a project would conflict with a plan if it would result in more growth or VMT than projected in the applicable plan.

Assumptions for off-road equipment emissions in the air quality plans are developed based on category-specific economic indicators such as employment, expenditures, and fuel use. Since project construction is limited to short-term activities, and construction activities would not involve unusual characteristics that would necessitate the use of extensive off-road equipment usage, the project would not increase the assumptions for off-road equipment use in the air quality plans. Further, construction activities would be short-term and would comply with the applicable SJVAPCD rules and regulations that are designed to reduce and control pollutant emissions from the project's construction activities.

Following construction, day-to-day operations of the project would not add any substantial new operational activities or result in more growth or VMT than projected in the air quality plans. The project is limited to minor alterations to existing facilities and installation of small, new facilities to improve water quality. The standby generator would also comply with SJVAPCD rules and regulations. As such, operational emissions are not anticipated to increase beyond existing conditions or conflict with the assumptions of the applicable air quality plans. Further, implementation of the project would not result in short-term or long-term increases in emissions that would exceed applicable thresholds of significance. Therefore, the impact would be less than significant.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Project construction would temporarily generate ROG, NOx, CO, SOx, PM10, and PM2.5 emissions from the use of off-road construction equipment, on-road motor vehicles, soil excavation and material transport. ROG, NOx, CO, and SOx emissions are associated primarily with exhaust from mobile equipment. Fugitive dust emissions (PM10 and PM2.5) occur primarily during site preparation and grading and vary based on parameters such as soil silt content, soil moisture, wind speed, acreage of disturbance area, and miles traveled by construction vehicles on- and off-site. The results of the analysis are summarized in Table 3.3.2 below along with a comparison to the established significance thresholds developed by the SJVAPCD. As shown in Table 3.3-2, the project's construction-related emissions would not exceed the annual and daily SJVAPCD thresholds of significance for criteria pollutants.

The SJVAPCD thresholds indicate whether an individual project's emissions have the potential to affect cumulative regional air quality (SJVAPCD 2015). As shown in Table 3.3-2, construction-related emissions would not exceed that thresholds; thus, construction emissions would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment.

Table 3.3-2: Estimated Daily and Annual Construction-Related Emissions

Description	CO	NOx	ROG	SOx	PM_{10}[1]	$PM_{2.5}$[1]
Daily Emissions (lbs/day)	8.58	11.83	1.05	0.02	2.85	0.98
Daily Screening Thresholds (lbs/day)	100	100	100	100	100	100
Annual Emissions (tpy)	0.65	0.77	0.08	<0.01	0.07	0.05
Annual Threshold of Significance (tpy)	100	10	10	27	15	15
Exceeds Thresholds?	No	No	No	No	No	No

Notes: CO = carbon monoxide; NOx = oxides of nitrogen; PM2.5 = fine particulate matter 2.5 micrometers or less in diameter; PM10 = respirable particulate matter 10 micrometers or less in diameter; ROG = reactive organic gases; SOx = oxides of sulfur; tpy = tons per year; lbs/day = pounds per day

1 Fugitive dust emission estimates of PM10 and PM2.5 would be further reduced with implementation of fugitive dust control practices per SJVAPCD Regulation VIII.

As discussed previously, maintenance and operational activities are anticipated to remain similar to existing conditions. The analysis quantified operational emissions associated with the project related to the maintenance and testing of the new standby generator, additional security lighting, and maintenance equipment. The operational emissions are summarized in Table 3.3-3.

Table 3.3-3: Estimated Daily and Annual Operational-Related Emissions

Description	CO	NOx	ROG	SOx	PM_{10}[1]	$PM_{2.5}$[1]
Daily Emissions (lbs/day)	1.00	0.77	0.28	<0.01	0.04	0.04
Daily Screening Thresholds (lbs/day)	100	100	100	100	100	100
Annual Emissions (tpy)	0.03	0.02	<0.01	<0.01	<0.01	<0.01
Annual Threshold of Significance (tpy)	100	10	10	27	15	15
Exceeds Thresholds?	No	No	No	No	No	No

Notes: CO = carbon monoxide; NOx = oxides of nitrogen; PM2.5 = fine particulate matter 2.5 micrometers or less in diameter; PM10 = respirable particulate matter 10 micrometers or less in diameter; ROG = reactive organic gases; SOx = oxides of sulfur; tpy = tons per year; lbs/day = pounds per day

As shown in Table 3.3-3, operational emissions would not exceed the SJVAPCD's thresholds of significance. Therefore, this impact would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Sensitive receptors typically are defined as facilities where sensitive populations (e.g., children, elderly, acutely and chronically ill individuals) are likely to be located. Land uses considered to be sensitive receptors include residences, schools, playgrounds, childcare centers, retirement homes, and hospitals. The nearest sensitive receptor to the project site is approximately 185 feet away.

Health Effects of Criteria Air Pollutants

As previously discussed, criteria air pollutants may adversely human or animal health, reduce visibility, damage property, and reduce the productivity or vigor of crops and natural vegetation. As shown in Tables 3.3-2 and 3.3-2, construction-related and operational activities would result in emissions of criteria air pollutants, but at levels that would not exceed the SJVAPCD thresholds of significance. The thresholds of significance were designed to identify those projects that would result in significant levels of air pollution and to assist the region in attaining the applicable state and federal ambient air quality

standards (SJVAPCD 2015), which were established using health-based criteria to protect the public with a margin of safety from adverse health impacts due to exposure to air pollution. As such, the criteria air pollutant emissions associated with construction and operation of the project would not expose sensitive receptors to substantial criteria pollutant concentrations. In addition, the project would comply with applicable SJVAPCD rules, including but not limited to Rule 4601 (Architectural Coatings), which restricts the VOC/ROG content of coatings, and Regulation VIII (Fugitive PM10 Prohibitions) which reduces the amount of PM entrained in the ambient air.

Toxic Air Contaminants

The greatest potential TAC emissions would be related to diesel PM emissions associated with activity by heavy-duty construction equipment. The total duration of construction activities is anticipated to be approximately 8 months; the exposure of sensitive receptors to construction emissions would be short term, intermittent, and temporary in nature. Health effects from TACs are often described in terms of individual cancer risk, which is based on a 30-year lifetime exposure to TACs (OEHHA 2015). Therefore, the total exposure period for construction activities would be approximately two percent of the total exposure period used for typical health risk calculations (i.e., 30 years). Further, considering that construction activities would vary and span across the different well sites, it is not anticipated that construction activities would be in proximity of sensitive receptors for an extended period of time.

Given the construction schedule, buffer distance to the nearest sensitive receptor, and the highly dispersive nature of diesel PM emissions, construction of the project would not expose sensitive receptors to substantial TAC concentrations. In addition, TAC emission exposure would also be reduced with implementation of California Air Resources Board regulations, such as the Airborne Toxic Control Measure (ATCM), which limits idling of diesel-fueled commercial motor vehicles. As a result, trucks and off-road equipment would not operate in the immediate vicinity of any sensitive receptor for an extended period of time and the potential exposure to TAC emissions would be limited.

As discussed previously, following construction, operation and maintenance of the project is anticipated to remain similar to existing conditions. As such, the project is not anticipated to result in an increase in vehicle trips and off-road equipment usage associated with staff or maintenance. The standby diesel generator would be a source of TAC emissions; however, the emergency generator would not be operated for extended periods of time and emissions would be limited to operation during maintenance and testing and infrequent power outages. Therefore, the project would not result in an increase in TAC emissions beyond existing conditions and the project would not expose sensitive receptors to substantial pollutant concentrations. The impact would be less than significant.

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

The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the presence of sensitive receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies. Projects with the potential to frequently expose individuals to objectionable odors

are deemed to have a significant impact. Typical facilities that generate odors include wastewater treatment facilities, sanitary landfills, composting facilities, petroleum refineries, chemical manufacturing plants, and food processing facilities.

Construction activities associated with the project could result in short-term odor emissions from diesel exhaust associated with construction equipment. However, the project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature.

Operation of the project is anticipated to remain similar to existing operations on-site. Since the project will not increase water supply capacity or increase the pumping rate, the project would not create objectionable odors affecting a substantial number of people. Therefore, this impact would be less than significant.

3.5 BIOLOGICAL RESOURCES

Table 3.4-1. Potential Impacts on Biological Resources

ENVIRONMENTAL ISSUES	ENVIRONMENTAL IMPACT SIGNIFICANCE
IV. Biological Resources. Would the project:	-
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Less than Significant with Mitigation
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	No Impact
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact
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 with Mitigation
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact
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

Note: "-" indicates blank cell

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

According to the biological study prepared for the project (AECOM 2018a), there are no federally listed plant species within the project sites. While the project area is within the potential dispersal range of San Joaquin kit foxes, none have been observed or reported in the project area (CDFW 2021). The nearest reported occurrence was 2.5 miles northeast of Del Rey, which was reported in the 1980s. One additional occurrence from the 1990s was reported approximately 12.5 miles to the northwest.

The biological study concluded that San Joaquin kit fox has a very low potential to occur in the project area. Urban environments outside of Bakersfield are not known to support populations of San Joaquin kit fox. Because well sites 4, 5, 6, and 7 (Figure 2) are located on the edge of the Del Rey Community Services District, outside of which there are areas of lower disturbance levels and large open lots, there is some potential for the species to forage or disperse around the well sites. There is marginally suitable foraging habitat in the urban and barren habitat; however, the prey base in the project footprint is limited by the sparse evidence of ground squirrel activity throughout the study area. No small- or medium-sized mammal burrows with the potential to provide suitable denning habitat for San Joaquin kit fox were observed in the study area during site reconnaissance undertaken for the biological study. Further, it is noted that San Joaquin kit fox needs loose-textured sandy soils for burrowing, and that the soils in the study area are too compacted for dens.

Construction activities have potential to cause direct effects to San Joaquin kit foxes, such as injury or mortality if hit by construction equipment or vehicles or from construction noise affecting foraging success or predator detection, which could cause kit foxes to permanently emigrate from the vicinity of construction areas to areas more susceptible to predation or with a lower prey base. Construction activities also have the potential to cause indirect effects such as degradation of foraging habitat because of increased trash that could attract predators, introduction of noxious weeds, or accidental spills and leaks from maintenance equipment and vehicles.

However, because kit foxes are primarily active at night and construction activities for the Project would be limited to daytime hours, vehicular strikes are not expected. The project also includes BMPs (see Section 2.2.4 above) which include preparation of a Hazardous Material Spill Prevention, Control, and Countermeasure Plan to minimize the potential for accidental spills and ensure that any accidental spills will be cleaned up immediately. Although the potential for kit foxes to occur in the project area is low, these impacts are conservatively identified as potentially significant.

Mitigation Measure BIO-1 is recommended, in addition to the general BMPs described in Section 2.2.4, to reduce this potentially significant impact.

> ***Mitigation Measure BIO-1: San Joaquin Kit Fox Protection Measures.***
> *Del Rey Community Services District shall include the following measures in the contractor specifications for the Project and ensure that the measures are implemented throughout all construction phases.*
>
> - *Exclusion fencing will be used to establish non-disturbance exclusion zones to restrict project equipment and personnel from sensitive areas and restrict wildlife species from*

entering the project footprint. Sensitive areas shall be identified by a qualified biologist and shall include habitats that may support federally listed species, such as small mammal burrows and burrow complexes and areas identified as buffers for potential occurrences of federally listed species. Two types of fencing—high-visibility construction fence and wildlife exclusion fencing (i.e., ERTEC)— will be used for these purposes. Exclusion fencing will be identified and depicted on the project plans and delineated in the field by a qualified biologist. The contractor will ensure that all areas outside of the project footprint are off-limits to project personnel and equipment. Species-appropriate wildlife exclusion fencing will be installed along the outer perimeter of environmentally sensitive areas, buried at least 6 inches below ground, to prevent intrusion below the fence line.

- *Exclusion fencing will be inspected on a weekly basis during construction for signs of tears, sagging, or other damage, and any such damage will be repaired immediately. Exclusion fencing will be removed and properly disposed upon completion of construction.*
- *All excavated, steep-walled holes or trenches more than 2 feet deep shall be covered at the close of each working day by plywood or similar materials, or provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped animals.*
- *If the San Joaquin kit fox is observed in the project footprint, work will not resume until the species moves away from the work area on its own.*
- *The contractor will provide closed garbage containers for the disposal of food-related trash items (e.g., wrappers, cans, bottles, or food scraps). Garbage will be removed daily from the project footprint. Project personnel will not feed or otherwise attract wildlife to the project footprint. No pets will be allowed in the project footprint.*

Implementation of mitigation measure MM-BIO-1 would reduce the likelihood of direct and indirect impacts to San Joaquin kit foxes during project construction, by preventing construction personnel from entering environmentally sensitive areas, and reducing the likelihood of San Joaquin kit fox entering active construction areas or being trapped. Therefore, with implementation of mitigation measure MM-BIO-1, in addition to the BMPs described in Section 2.2.4, the project would have a less-than-significant with mitigation impact on special-status species.

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

The well sites are in a predominately urban and built area, which contains no riparian habitat or other sensitive natural communities. Adjacent lands to the west are utilized for agriculture, which have also been disturbed and provide no habitat. No native habitats exist in the vicinity of the project area (AECOM 2018a). Therefore, there would be no impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

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

There are no wetlands in or in the vicinity of the project area (AECOM 2018a). Therefore, there would be no impact.

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?

As discussed previously, the project area is within the potential dispersal range of San Joaquin kit foxes, but none have been observed or reported in the project area (AECOM 2018a; CDFW 2021). An individual San Joaquin kit fox has an average home range of 1 to 2.5 square miles (Knapp 1978, Morrell 1972, Haight et al. 2002). The San Joaquin kit fox inhabits arid valley and foothill grasslands, sparsely vegetated scrub/shrub habitats (O'Farrell 1983, USFWS 1998), and some agricultural and urban areas (Jensen 1972, Morrell 1972). San Joaquin kit fox are quite tolerant of human disturbances and will, to a minimal extent, use oil fields and developed and agricultural lands, particularly for foraging and movement or migration. However, the use of agricultural lands by San Joaquin kit fox is dependent on prey availability and refugia opportunities.

The biological report prepared for the project (AECOM 2018a) concluded that there is very low potential for San Joaquin kit fox to occur in the study area, but that the area could serve as a migratory and dispersal corridor for kit foxes. As discussed previously, construction activities have the potential to adversely affect kit foxes; therefore, this impact is conservatively identified as potentially significant.

Mitigation Measure BIO-1 is recommended to reduce this potentially significant impact.

> ***Mitigation Measure BIO-1: San Joaquin Kit Fox Protection Measures.***
> *[Full text of mitigation measure described for impact a) above.]*

Implementation of mitigation measure MM-BIO-1 would reduce the likelihood of direct and indirect impacts to San Joaquin kit foxes during project construction, by preventing construction personnel from entering environmentally sensitive areas, and reducing the likelihood of San Joaquin kit fox entering active construction areas or being trapped. Therefore, with implementation of mitigation measure MM-BIO-1 the project would have a less-than-significant with mitigation impact on the movement of wildlife species or migratory wildlife corridors.

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

During project construction, some ground cover vegetation will be removed but no trees would be impacted. Therefore, the project would not conflict with local policies or ordinances protecting trees or other biological resources, and no such policies or ordinances are applicable to the project area. There would be no impact.

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?

The proposed project is not within a habitat conservation plan or natural community conservation plan. Therefore, there would be no impact.

3.6 CULTURAL RESOURCES

Table 3.5-1. Potential Impacts on Cultural Resources

ENVIRONMENTAL ISSUES		ENVIRONMENTAL IMPACT SIGNIFICANCE
V.	**Cultural Resources. Would the project:**	-
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	No Impact
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	No Impact
c)	Disturb any human remains, including those interred outside of formal cemeteries?	No Impact

Note: "-" indicates blank cell

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

According to the Historic Property Inventory Report prepared for the project (AECOM 2018b), there are no historical resources within a half-mile radius of the study area. Therefore, there would be no impacts to historical resources.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Soils in the project area a predominately underlain by Exeter series. As discussed in Historic Property Inventory Report (AECOM 2018b), Exeter soils have been demonstrated to date from the Pleistocene, and thus are too old to reasonably contain buried archaeological deposits (AECOM 2018b). Furthermore, the project area is in an urbanized area with lands that have been disturbed. Thus, the project area would have paleontological low sensitivity and there would be no impact.

c) Disturb any human remains, including those interred outside of formal cemeteries?

It is unlikely that the proposed project would disturb any human remains, as the project area is on previously disturbed land. However, if previously unidentified cultural resources are unearthed during construction, standard accidental discovery protocols would be implemented: work would be halted in the area until a qualified archaeologist can assess the significance of the find. If human remains are encountered during construction, all work in that area must halt and the Fresno County Coroner must be contacted pursuant to California Public Resources Code Sections 5097.94, 5097.98, and 5097.99 (AECOM 2018b). Therefore, there would be no impacts.