



Kara Cunningham, LSA speaking

Response to comments submitted by Adams, Brodwell, Joseph & Cardozo after the Notice of Public Hearing was posted, and the comments just heard over Zoom from Kevin Carmichael. According to the City's hired consultant to do a complete environmental analysis, LSA, the comment letter and supporting technical studies do not provide any new information or issues that were not previously responded to in the final EIR.

The Commenter says: Final EIR fails to disclose and mitigate transportation impacts.

In response B3-6 of Final EIR

- Project includes industrial uses by tenants that have not been identified, and the applicant has confirmed that an Amazon facility is not under consideration to be a possible tenant, therefore using Amazon trip generation rates would not be accurate.
- The trip generations of the project were developed using rates from the Western Riverside COG Study, which uses a high sample size and higher trip generations than the ITE Manual, and as stated in that study, the Amazon facility is an outlier, but does include Amazon to calculate the average trip generation.

The Vehicle Miles Traveled (VMT) Analysis is flawed and factually incorrect.

In Response B3 – 12 of the Final EIR

- The Fresno COG Activity Based Model (ABM) was used to estimate the project's Vehicle Miles Traveled, not the CA State Travel Demand Model, as stated in the comments.
- The Fresno COG ABM has external stations which account for internal to external trips which also account for passthrough traffic through the County.
- The trip lengths of the External Stations were calibrated using trip lengths from the Statewide Model, which is a conservative approach.
- Additionally, the VMT analysis took into account all trips including trucks.

Fails to address health risks impacts from transportation refrigerated units.

In Response B3 – 42 of the Final EIR

- The air quality analysis contained in the EIR assumed that trucks accessing the project site would idle using main engines rather than an auxiliary power unit or plugging into onsite electrical hook-ups. This is a conservative assumption as loading docks are required to have electrical hook-ups and trucks would run from that electricity during idling.
- It is likely that the trucks would only briefly operate on their own power while maneuvering onsite.
- As such, because TRU trucks would be required to plug in any emissions would be minimal and would not result in significant emissions.



The Final EIR failed to address health risk impacts from back-up generators.

In response A4 – 6 of the final EIR

- To be conservative, a supplemental analysis to evaluate potential emissions associated with equipment, emergency backup generators, and diesel fire pumps was conducted using the air quality model [CAIEMod](#). Emissions would be well below thresholds and considered less than significant.
- In addition, the toxic air contaminants of concern would be Diesel Particulate Matter (DPM).
- The health risk assessments typically use PM 10 emissions to represent DPM and PM 10 emissions associated with the equipment would be minimal, therefore an updated health risk assessment is not warranted, and a significant health risk would not occur.
- It is also important to note that the project does not propose equipment emergency backup generators or diesel fire pumps. This additional analysis was included to be conservative.

The Final EIR fails to address impacts from Valley Fever, and fails to include mitigation measures to reduce Valley Fever.

In Response B3 – 10 of the Final EIR

- The air quality analysis was prepared based on the San Joaquin Valley Air Pollution Control District guidance, which does not include requirements or thresholds of significance for addressing Valley Fever, and nor does CEQA.
- Additionally the project would not exacerbate or significantly add to Valley Fever, therefore mitigation to reduce impacts is not required.

The Final EIR fails to disclose, analyze, and mitigate noise impacts.

In response B3 – 24 of the Final EIR

- The City's General Plan policy NS-1-J states that the City considers a 3 DBA increase to be a significant increase. Project operational noise increases would not exceed this threshold.
- For construction related noise mitigation should only be required for a 5 DBA increase. The project's construction noise increase would be less than a 5 DBA increase and therefore would be less than significant.
- In addition, although project construction related noise would be less than the 5 DBA threshold construction has the potential to result in annoyance therefore the applicant would be required to implement mitigation measure NOI-1 to reduce annoyance, however again construction noise would be less than significant and additional mitigation measures are not required.



FINAL COMMENTS FROM LSA:

The commenter also includes a number of recommendations to reduce impacts related to air quality and greenhouse gasses and claims that the EIR fails to consider the Attorney Generals best practices in mitigation for warehouse projects.

- The comment does not present substantial evidence of the identification of a potentially significant impact, therefore additional mitigation beyond what was included in the EIR would not be required.

Lastly the commenter also claims that the Final EIR fails to disclose inconsistency with the City's General Plan Subdivision Map Act and that the City cannot make the findings for the project including the approval of land use permits.

- For the reasons explained in and throughout the Draft EIR and the Final EIR, the EIR properly evaluated the project's potential impacts and the commentor has not presented evidence to the contrary. In addition, the EIR properly evaluated the impacts related to transportation, air quality, health risks, greenhouse gas, noise, and land use and planning, and the project would not result in any significant unavoidable impacts.

[VIDEO – Planning Commission Hearing on 10/4/23 – 2:47 – 2:55](#)