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City of Hanford
317 North Douty Street
Hanford, CA 93230

Environmental Impact Report for the Fargo Village Project

1 Executive Summary

This Draft Environmental Impact Report (EIR) has been prepared to address the environmental effects associated with the implementation of the proposed Fargo Village Development Project. The Paul Singh Family Limited Partnership has submitted an application to the City of Hanford for the construction of 1,146 units consisting of single-family homes, and apartment units. Additionally, 6.73 acres are dedicated to various neighborhood commercial use, a 12.36-acre public park/open space, a 14.99-acre school zone, and a 6.18-acre stormwater retention basin. The proposed Project will occur on approximately 304 acres of agricultural land within the City of Hanford.

The City of Hanford, as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this EIR for the proposed Project. This EIR is an informational document for the general public and governmental agencies to review and evaluate the proposed Project. The reader should not rely exclusively on the Executive Summary as the sole basis for judgment of the proposed Project and alternatives; rather, the complete EIR should be consulted for specific information about the environmental effects and the implementation of associated mitigation measures.

The environmental issue areas that were found to have potentially significant impacts in the Initial Study (Appendix A2) included Air Quality, Transportation, and Hazards and Hazardous Materials. These potential impacts were related to vehicle miles traveled (VMT) and the potential effects of toxic air contaminants on sensitive receptors near the Project site. These issue areas and their associated impacts are described in more detail in Section 4, Environmental Analysis of this EIR.

1.1 Summary of Proposed Project

The Project proposes a mixed-use community consisting of low and medium-density residential development, as well as commercial, educational, and recreational uses on 304 gross acres within the City of Hanford's Sphere of Influence. The Project site's existing and proposed zoning is Low-Density Residential (R-L), Medium-Density Residential (R-M), High-Density Residential (R-H), Neighborhood Commercial (N-C), and Public Facilities (P-F). The

Project proposes 926 single-family homes and 13 acres of apartment units. The low-density residential component will consist of 11,900 square foot lots, 7,200 square foot lots, and 5,000 square foot lots. The 6.73-acre neighborhood commercial area will contain a mix of retail and gas station services. The Project also includes 12.36 acres of public park space, a 14.99-acre school zone, and a 6.18-acre stormwater retention basin.

The Project would result in onsite and offsite infrastructure improvements including new and relocated utilities, new residential streets, and the continuation and improvement of Flint, Fargo, and 12th Avenue. The Project would also require the demolition of one 650 square-foot storage building currently on the site.

1.2 Project Location

The proposed Project is located on approximately 304 acres in the northern portion of the City of Hanford, California. The site is generally bound by Fargo Avenue to the south, 12th Avenue to the west, the BNSF Railway to the east, and Flint Avenue to the north (See Figure 1-1). The site is comprised of two parcels: APN 007-010-031-000 and007-360-016-000. APN 007-010-031-000 is 151.96 acres consisting of agricultural uses; mainly walnut orchards and vineyards. An agricultural irrigation canal, irrigation equipment, dirt access roads, and a storage building currently exist in this parcel. APN 007-360-016-000 is 150.08 acres consisting of agricultural uses, mainly walnut orchards, vineyards, and field crops. Irrigation equipment and dirt access roads currently exist in this parcel. The entire site is within the City of Hanford limits. The site is currently used for agricultural uses, however, the site has been designated by the City's General Plan for Low, Medium and High-Density Residential, as well as Neighborhood Commercial.

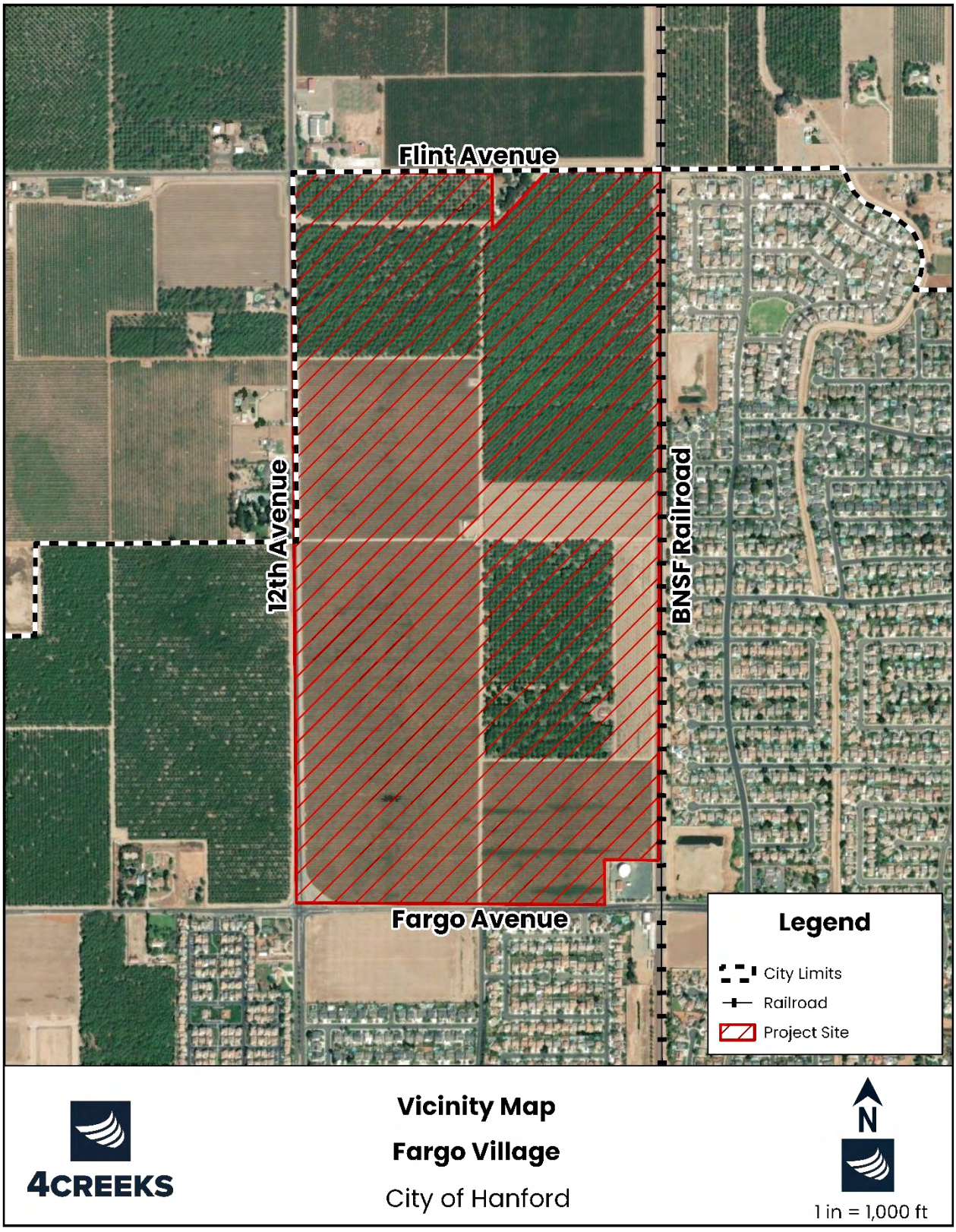

Figure 1-1. Project Vicinity Map

Figure 1-2. Northern Portion of Project Site

Figure 1-3. Southern Portion of Project Site

1.3 Environmental Review Process

The City of Hanford has prepared and transmitted a Notice of Preparation (NOP) for this EIR. This Draft EIR is being released for agency and public review for a 45-day public review period. After completion of the public review period, all comments received on the Draft EIR will be reviewed and written responses will be prepared, along with any necessary revisions to the Draft EIR for the purposes of its finalization. The City of Hanford Planning Commission would review and certify the Final EIR; following certification, the Planning Commission would make findings on any significant environmental effects and consider approval of the Project. All comments received during the NOP period and during the scoping process will be included in Appendix A1.

1.4 Summary of Alternatives Analysis

Section 6 (Alternatives) provides a description of the Project alternatives. Also evaluated is the No Project Alternative, as required under §15126.6 (e) of the California Code of Regulations. The alternatives analysis includes a discussion of alternatives that were dismissed from further consideration, as well as a comparative analysis of a reasonable range of potentially feasible Project alternatives. The alternatives in the comparative analysis include the following:

- **No Project Alternative.** Under this alternative, the proposed Project would not be constructed, and the Project site would remain in its current condition. However, due to the site containing low, medium and high-density residential zoning as well as neighborhood commercial and public facility zoning there is a high probability that the site will be developed into a mixed-use property in the future.
- **Alternative 2 (Change in Housing Mix Alternative).** Alternative 2 involves changes to the residential portion of the Project but no changes to the park, school or commercial portions. Alternative 2 proposes a decrease in the number of single-family homes, and an increase in the number of multi-family homes built but keeping the 1,146 units as planned. This alternative seeks to avoid or reduce significant and unavoidable transportation impacts of the proposed Project by decreasing vehicle miles traveled (VMT) associated with the proposed Project as well as reduce the potential for impacts to sensitive receptors. However, the development would have greater densities and may not accommodate the need for single-family housing in the area, and impacts related to sensitive receptors would likely remain unchanged.

1.5 Environmentally Superior Alternative

Based on the analysis contained in Section 4 (Environmental Analysis) and Section 6 (Alternatives) of this EIR, the proposed Project is the environmentally superior alternative. The proposed Project best accomplishes developing the site with residential, neighborhood

commercial, parks/recreation, and public facility uses while being consistent with the zoning designation of the site. Additionally, alternatives to the Project were not found to substantially reduce or avoid VMT and sensitive receptor impacts associated with the Project. As described in Section 6 (Alternatives), the No Project Alternative would result in no VMT, and sensitive receptor impacts but would not achieve any of the Project objectives. Alternative 2 could potentially reduce VMT impacts to less than significant levels and further reduce the potential for sensitive receptor impacts, but there is no guarantee that the proposed alterations to the Project would effectively reduce VMT or sensitive receptor impacts to less than significant levels.

1.6 Summary of Impacts and Mitigation Measures

Section 4 (Environmental Analysis) of this EIR presents the direct and indirect impacts associated with the proposed Project, as well as its incremental contribution to cumulative effects. As discussed, the proposed Project would result in significant and unavoidable VMT impacts. As discussed in Appendix A2, Initial Study, all other impacts associated with the Project were found to be less than significant or reduced to a level of less than significant with the implementation of mitigation measures, as summarized in Table 1-1.

Table 1-1. Summary of Impacts and Mitigation Measures

Criteria/Impact	Summary of Mitigation Measures	Level of Significance
Aesthetics		
a) Have a substantial adverse effect on a scenic vista?	▪ No mitigation is required.	No Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings with a state scenic highway?	▪ No mitigation is required.	No Impact
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?	▪ No mitigation is required	No Impact

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	▪ No mitigation is required	Less than Significant Impact
Agricultural and Forest Resources		
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?	▪**Mitigation Measure AG-1:** Disclosure and Recordation Requirement. ▪The Project shall comply with HMC Section 16.40.110 Right to Farm, subsection (E) Disclosure and Recordation Requirements: *"All approvals for improvement or development of property including without limitation application for rezonings, land divisions, zoning permits, and residential building permits, on property in the city of Hanford within one (1) mile of the city's urban limit line, shall include a condition that notice, and disclosure of this agricultural land use policy be given by the applicant, or the owner if different from the applicant. The applicant, or owner if different from the applicant, shall also acknowledge the contents of the notice and disclosure, which includes a description of the property the notice pertains to, in the Official Records of the Kings County Recorder, and recorded at the applicant's own expense."* The Hanford Community Development Department is responsible for carrying out the	Less than Significant with Mitigation Incorporation

	notice, disclosure, and recordation required by the HMC.	
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	▪ No mitigation is required	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 mitigation is required	No Impact
d) Result in the loss of forestland or conversion of forest land to non-forest use?	▪No mitigation is required	No Impact
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?	▪No mitigation is required	Less than Significant Impact
Air Quality		
a) Conflict with or obstruct implementation of the applicable air quality plan?	▪No mitigation is required	No Impact
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?	▪No mitigation is required	Less than Significant Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	▪**Mitigation Measure HRA-1:** Implement Tier 4 Engine Controls for all off-road, diesel-fueled equipment during construction. Unlike Tier 1 through Tier 3 engine controls, Tier 4 generally requires the addition of emissions control equipment even to new engines,	Less than Significant Impact

	such as a Diesel Particulate Filter (DPF). (See Section 4.11 of this EIR)	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	▪No mitigation is required	Less than Significant Impact
Biological Resources		
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?	▪No mitigation is required	Less than Significant Impact
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?	▪No mitigation is required	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 director removal, filling, hydrological interruption, or other means?	▪No mitigation is required	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?	▪No mitigation is required	Less than Significant Impact

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	▪No mitigation is required	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 mitigation is required	No Impact
Cultural Resources		
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	▪ **Mitigation Measure CUL-1: Protection of Cultural Resources.** In order to avoid the potential for impacts on historic and prehistoric archaeological resources, the following measures shall be implemented, as necessary, in conjunction with the construction of the Fargo Village Project: a) *Cultural Resources Alert on Project Plans*. The Project proponent shall note on any plans that require ground-disturbing excavation that there is a potential for exposing buried cultural resources. b) *Pre-Construction Briefing*. The Project proponent shall retain Santa Rosa Rancheria Cultural Staff to provide a pre-construction Cultural Sensitivity Training to construction staff regarding the discovery of cultural resources and the potential for discovery during ground-disturbing activities, which will include information on potential cultural material	Less Than Significant With Mitigation Incorporation

	finds and, on the procedures, to be enacted if resources are found. c) *Stop Work Near any Discovered Cultural Resources*. The Project proponent shall retain a professional archaeologist on an "on-call" basis during ground-disturbing construction for the Project to review, identify and evaluate cultural resources that may be inadvertently exposed during construction. Should previously unidentified cultural resources be discovered during the construction of the Project, the Project proponent shall cease work within 100 feet of the resources, and Kings County Community Development Agency (CDA) shall be notified immediately. The archaeologist shall review and evaluate any discoveries to determine if they are historical resource(s) and/or unique archaeological resources under CEQA. d) *Mitigation for Discovered Cultural Resources*. If the professional archaeologist determines that any cultural resources exposed during construction constitute a historical resource and/or unique archaeological resource, he/she shall notify the Project proponent and other appropriate parties of the evaluation and	

	recommend mitigation measures to mitigate the impact to a less-than-significant level. Mitigation measures may include avoidance, preservation in place, recordation, additional archaeological testing, and data recovery, among other options. Treatment of any significant cultural resources shall be undertaken with the approval of the Kings County CDA. The archaeologist shall document the resources using DPR 523 forms and file said forms with the California Historical Resources Information System, Southern San Joaquin Valley Information Center. The resources shall be photo-documented and collected by the archaeologist for submission to Santa Rosa Rancheria's Cultural and Historical Preservation Department. The archaeologist shall be required to submit to the County for review and approval a report of the findings and method of curation or protection of the resources. Further grading or sitework within the area of discovery shall not be allowed until the preceding steps have been taken. e) *Native American Monitoring.* Prior to any ground disturbance, the Project proponent shall offer the	

	Santa Rosa Rancheria Tachi Yokut Tribe the opportunity to provide a Native American Monitor during ground-disturbing activities during construction. Tribal participation would be dependent upon the availability and interest of the Tribe. f) *Disposition of Cultural Resources.* Upon coordination with the Kings County Community Development Agency, any prehistoric archaeological artifacts recovered shall be donated to an appropriate Tribal custodian or a qualified scientific institution where they would be afforded applicable cultural resources laws and guidelines. ▪ **Mitigation Measure CUL-2: Protection of Buried Human Remains.** In order to avoid the potential for impacts on buried human remains, the following measures shall be implemented, as necessary, in conjunction with the construction of the Project: a) Pursuant to State Health and Safety Code Section 7050.5(e) and Public Resources Code Section 5097.98, if human bone or bone of unknown origin is found at any time during on- or off-site construction, all work shall stop within 25 feet of the discovery, the Kings County	

	Coroner shall be notified immediately, and the resource shall be protected in compliance with applicable state and federal laws. If the remains are determined to be Native American, the Coroner shall notify the California State Native American Heritage Commission (NAHC), who shall identify the person believed to be the Most Likely Descendant (MLD) pursuant to Public Resources Code Section 5097.98. The Project proponent and MLD, with the assistance of the archaeologist, shall make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines Sec. 15064.5(d)). The agreed-upon treatment shall address the appropriate excavation and removal, California Public Resources Code allows 48 hours for the MLD to make their wishes known to the landowner after being granted access to the site. If the MLD and the other parties do not agree on the reburial method, the Project will follow Public Resources Code Section 5097.98(e) which states that ". . . the landowner or his or her authorized representative shall reinter the human remains, and	

	items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance." ▪Any findings shall be submitted by the archaeologist in a professional report submitted to the Project applicant, the MLD, the Kings County Community Development Agency, and the California Historical Resources Information System, Southern San Joaquin Valley Information Center.	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	▪See **Mitigation Measures CUL-1** & **CUL-2**	Less Than Significant With Mitigation Incorporation
c) Disturb any human remains, including those interred outside of formal cemeteries?	▪See **Mitigation Measure CUL-2**	Less Than Significant With Mitigation Incorporation
Energy		
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	▪No mitigation is required	Less than Significant Impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	▪No mitigation is required	No Impact
Geology and Soils		
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	▪No mitigation is required	No Impact
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map	▪No mitigation is required	No Impact

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.		
ii) Strong seismic ground shaking?	▪No mitigation is required	No Impact
iii) Seismic-related ground failure, including liquefaction?	▪No mitigation is required	No Impact
iv) Landslides?	▪No mitigation is required	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	▪No mitigation is required	Less than Significant Impact
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?	▪No mitigation is required	No Impact
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?	▪No mitigation is required	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	▪No mitigation is required	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	▪See **Mitigation Measures CUL-1** & **CUL-2**	Less Than Significant With Mitigation Incorporation
Greenhouse Gas Emissions		
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	▪No mitigation is required	Less than Significant Impact

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	▪No mitigation is required	No Impact
Hazards and Hazardous Materials		
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	▪See **Mitigation Measure HRA-1**	Less than Significant Impact with Mitigation
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?	▪No mitigation is required	Less than Significant Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	▪No mitigation is required	Less than Significant Impact
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?	▪No mitigation is required	No Impact
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?	▪No mitigation is required	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	▪No mitigation is required	No Impact

g) Expose people or structures, either directly or indirectly, to significant risk of loss, injury or death involving wildland fires?	▪No mitigation is required	No Impact
Hydrology and Water Quality		
a) Violate any water quality standards or waste discharge requirements or otherwise sustainably degrade surface or ground water quality?	▪**Mitigation Measure HYD-1:** Prior to the issuance of any construction/grading and/or the commencement of any clearing, grading, or excavation, the Applicant shall submit a Notice of Intent (NOI) for discharge from the Project site to the California SWRCB Storm Water Permit Unit. ▪Prior to issuance of grading permits for Phase 1 the Applicant shall submit a copy of the NOI to the City. ▪The City shall review noticing documentation prior to approval of the grading permit. City monitoring staff will inspect the site during construction for compliance. ▪**Mitigation Measure HYD-2:** The Applicant shall require the building contractor to prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) to the County 45 days prior to the start of work for approval. The contractor is responsible for understanding the State General Permit and instituting the SWPPP during construction. An SWPPP for site construction shall be developed prior to the initiation of grading and implemented for all construction activity on the Project site in excess of one (1) acre, or where the area of disturbance is less than one acre but is part of	Less Than Significant With Mitigation Incorporation

	the Project's plan of development that in total disturbs one or more acres. The SWPPP shall identify potential pollutant sources that may affect the quality of discharges to stormwater and shall include specific BMPs to control the discharge of material from the site. The following BMP methods shall include, but would not be limited to: ▪Dust control measures will be implemented to ensure the success of all onsite activities to control fugitive dust; ▪A routine monitoring plan will be implemented to ensure the success of all onsite erosion and sedimentation control measures; ▪Provisional detention basins, straw bales, erosion control blankets, mulching, silt fencing, sandbagging, and soil stabilizers will be used; ▪Soil stockpiles and graded slopes will be covered after two weeks of inactivity and 24 hours prior to and during extreme weather conditions; and, ▪BMPs will be strictly followed to prevent spills and discharges of pollutants on site, such as material storage, trash disposal, construction entrances, etc.	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	▪ No Mitigation is required	Less than Significant Impact

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?	(See **Mitigation Measures HYD-1** & **HYD-2**) ▪**Mitigation Measure HYD-3:** A Development Maintenance Manual for the Project shall include comprehensive procedures for maintenance and operations of any stormwater facilities to ensure long-term operation and maintenance of post-construction stormwater controls. The maintenance manual shall require that stormwater BMP devices be inspected, cleaned, and maintained in accordance with the manufacturer's maintenance conditions. The manual shall require that devices be cleaned prior to the onset of the rainy season (i.e., mid-October) and immediately after the end of the rainy season (i.e., mid-May). The manual shall also require that all devices be checked after major storm events. The Development Maintenance Manual shall include the following: ▪Runoff shall be directed away from trash and loading dock areas; ▪Bins shall be lined or otherwise constructed to reduce leaking of liquid wastes; ▪Trash and loading dock areas shall be screened or walled to minimize offsite transport of trash; and,	Less Than Significant With Mitigation Incorporation

	▪Impervious berms, trench catch basin, drop inlets, or overflow containment structures nearby docks and trash areas shall be installed to minimize the potential for leaks, spills or wash down water to enter the drainage system.	
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	See **Mitigation Measure HYD-2** ▪**Mitigation Measure HYD-1 (a):** Low Impact Development Design. Future development pursuant to the 2035 Kings County General Plan shall incorporate LID principles into the Project design to minimize long-term stormwater runoff. Such principles shall include: ▪Permeable paving, such as pavers, porous concrete, or pathway comprised of decomposed granite that is effective in stormwater infiltration to help prevent excess runoff. ▪Use of "urban bio-swales" to redirect stormwater into planter strips, rather than capturing runoff in pipes and diverting it to a remote location. ▪Use of water-efficient irrigation (e.g., drip irrigation system) to water trees, shrub beds, and areas of groundcover to eliminate evaporation losses and minimize runoff. ▪Use of predominately (75 percent) native plants and drought-tolerant landscaping wherever possible.	Less Than Significant With Mitigation Incorporation
(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	▪See **Mitigation Measures HYD-1**, **HYD-2** and **HYD-3**	Less Than Significant With Mitigation Incorporation

(iv) impede or redirect flood flows?	▪See **Mitigation Measure HYD-2**	Less Than Significant With Mitigation Incorporation
d) In flood hazard, tsunami, or seiche zones risk the release of pollutants due to Project inundation?	▪No Mitigation is required	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater movement plan?	▪No Mitigation is required	No Impact
Land Use and Planning		
a) Physically divide an established community?	▪No Mitigation is required	No Impact
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?	▪No Mitigation is required	No Impact
Mineral Resources		
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?	▪No Mitigation is required	No Impact
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?	▪No Mitigation is required	No Impact
Noise		
a) 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?	▪No mitigation is required	Less than Significant Impact

b) Generation of excessive ground-borne vibration or groundborne noise levels?	▪No mitigation is required	Less than Significant Impact
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 mitigation is required	No Impact
Population and Housing		
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)?	▪No mitigation is required	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	▪No mitigation is required	No Impact
Public Services		
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:		

▪ Fire protection?	▪No mitigation is required	Less than Significant Impact
▪ Police protection?	▪No mitigation is required	Less than Significant Impact
▪ Schools?	▪No mitigation is required	Less than Significant Impact
▪ Parks?	▪No mitigation is required	Less than Significant Impact
▪ Other public facilities?	▪No mitigation is required	Less than Significant Impact
Recreation		
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	▪No mitigation is required	No Impact
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?	▪No mitigation is required	No Impact
Transportation		
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	▪No mitigation is required	Less than Significant Impact
b) Conflict or be inconsistent with the CEQA guidelines Section 15064.3, Subdivision (b)?	▪**Mitigation Measure T-17:** The Project Proponent is responsible for pay the fair share proportion (76.48%) of the intersection improvements for adding a northbound right lane at 12th Avenue and Fargo Avenue.	Significant and Unavoidable

	▪**Mitigation Measure T-18:** The Project Proponent shall be required to improve the intersection of Fitzgerald Lane and Fargo Avenue by installing two-way left turn lane (TWLTL) median with provision of merging lane for northbound left turn (NBL) traffic from Fitzgerald Lane by project buildout. ▪**Mitigation Measure T-19:** The Project Proponent shall be required to improve the intersection of 12th Avenue and Project Driveway 1 by paying their fair share contribution installing a traffic signal by project buildout. ▪**Mitigation Measure T-20:** The Project Proponent shall be required to improve the intersection of Project Driveway 4 and Fargo Avenue by installing a traffic signal by project buildout. **See Section 4.8 of this EIR**	
d) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	▪No mitigation is required	No Impact
e) Result in inadequate emergency access?	▪No mitigation is required	No Impact
Tribal Cultural Resources		
a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or		

object with cultural value to a California Native American tribe, and that is:		
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	▪See **Mitigation Measures CUL-1** & **CUL-2**	Less Than Significant With Mitigation Incorporation
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.	▪See **Mitigation Measures CUL-1** & **CUL-2**	Less Than Significant With Mitigation Incorporation
Utilities and Service Systems		
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?	▪No mitigation is required	Less than Significant Impact
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	▪No mitigation is required	Less than Significant Impact
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?	▪No mitigation is required	Less than Significant Impact

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?	▪No mitigation is required	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	▪No mitigation is required	No Impact
Wildfire		
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	▪No mitigation is required	No Impact
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?	▪No mitigation is required	No Impact
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?	▪No mitigation is required	Less than Significant Impact
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?	▪No mitigation is required	No Impact
Mandatory Findings of Significance		
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	▪See **Mitigation Measures AG-1, HRA-1, CUL-1, CUL-2, HYD-1, H-1(a) HYD-2, HYD-3, T-17, T-14, T-18, and T-19**	Less Than Significant With Mitigation Incorporation *With the exception of Impact TR-1 which is

	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?		Significant and Unavoidable
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)?	▪See Mitigation Measures: **AG-1, HRA-1, CUL-1, CUL-2, HYD-1, H-1(a) HYD-2, HYD-3, T-17, T-14, T-18 and T-19**	Less Than Significant With Mitigation Incorporation *With the exception of transportation impact which is Significant and Unavoidable
c)	Does the Project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	▪No Mitigation is required	Less than Significant Impact

1.7 Areas of Controversy/Issues to be Resolved

NOP Comments

The scope of this EIR includes the potential environmental impacts identified in the Initial Study/Notice of Preparation (IS/NOP) that was available for public review from August 16th, 2024, through September 16th, 2024; comments received during a public scoping meeting held on September 4th, 2024, at the Hanford City Hall Training Room; and agency written comment received in response to the NOP.

During the NOP Process the City of Hanford received one written comment letters in response to the IS/NOP. The City received a comment letter from the following agency:

- California Department of Fish and Wildlife

A summary of these written comment letters is provided in Table 1-2. The written comments and the NOP are included as Appendix A1 of this Draft EIR.

Table 1-2. NOP Comments Received

Commenter	Date	Summary of Environmental Issues Raised	EIR Chapter/Section Where Comment is Addressed
State Agency			
California Department of Fish and Wildlife (CDFW)	September 20th, 2024	The CDFW recommended to conduct surveys for Swainson's Hawk and other nesting birds, avoid ground-disturbing activities during the nesting season (February 1st to September 15th), and obtain a Lake and Streambed Alteration Agreement if there are any modifications to the bed, bank, or channel of a river, stream, or lake as outlined in Fish and Game Code Section 1600 et seq. Any alterations to a lake or streambed would also require notification to the California Department of Fish and Wildlife (CDFW) under Fish and Game Code Section 1602.	Appendix A2 – Initial Study, Biological Resources Section (pp. 61-72)

2 Introduction

2.1 Purpose and Intended Uses of the EIR

This Environmental Impact Report (EIR) has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA). The City of Hanford is the Lead Agency under CEQA. CEQA requires the Lead Agency to consider the information contained in an environmental review document, in this case, an EIR, prior to taking any discretionary action. This EIR serves as an informational document for the City of Hanford to consider when making their discretionary approval of the proposed Project and for other agencies and interested parties during their respective review of the proposed Project.

This EIR evaluates potential environmental impacts and identifies recommended mitigation measures to offset direct, indirect, and cumulative impacts associated with the proposed Project's implementation. This EIR also identifies and evaluates the impacts of alternatives to the proposed Project, discloses growth-inducing impacts, identifies its significant and unavoidable effects as well as any significant and/or irreversible environmental changes.

2.2 Project Description and Purpose

The Project proposes 1,146-units of low, medium, and high-density residential development, neighborhood commercial development, a school site, and park/open space on approximately 304 gross acres in the City of Hanford. The Project site's existing and proposed zoning is low-density residential (R-L), medium-density residential (R-M), high-density residential (R-H), neighborhood commercial (C-N), and public facilities (P-F). The Project includes 926 single family homes and 13 acres of apartment units. 6.73 acres of the site are planned to be used for neighborhood commercial development, which may consist of two retail stores, a gas station, a restaurant, a drive-thru restaurant, and an outdoor food court, but the exact uses have not been finalized. The Project will also contain approximately 12.36 acres of parks and open space, which will contain a soccer/football field, basketball courts, and playgrounds. The Project also proposes approximately 14.99 acres for a future school site and a 6.18-acre onsite stormwater drainage basin.

The Project would result in onsite and offsite infrastructure improvements including new and relocated utilities, new residential streets, a stormwater basin, and improvements to Fargo Avenue, Flint Avenue, and 12th Avenue, which border the site. Lastly, the Project would require the demolition of one 650-square-foot storage building.

2.3 Project Location

The proposed Project is located on approximately 304 acres in the northern portion of the City of Hanford, California. The Site is generally bound by Fargo Avenue to the south, 12th Avenue to the west, the BNSF Railway to the east, and Flint Avenue to the north (See Figure 1-1). The site is comprised of two parcels: APN 007-010-031-000 and007-360-016-000. APN 007-010-031-000 is 151.96 acres consisting of agricultural uses; mainly walnut orchards and vineyards. An agricultural irrigation canal, irrigation equipment, dirt access roads, and a storage building currently exist in this parcel. APN 007-360-016-000 is 150.08 acres consisting of agricultural uses, mainly walnut orchards, vineyards, and field crops. Irrigation equipment and dirt access roads currently exist in this parcel. The entire site is within the City of Hanford limits. The site is currently used for agricultural uses, however, the site has been designated by the City's General Plan for Low, Medium, and High-Density Residential, as well as Neighborhood Commercial.

2.4 Required Permits and Approvals

The following discretionary approvals are required from local agencies for the proposed Project:

- Planned Unit Development Plan Approval to blend the densities
- Tentative Parcel Map Approval
- Tentative Tract Map Approval
- City of Hanford Building and Encroachment Permits
- San Joaquin Valley Air Pollution Control District (SJVAPCD). The proposed Project is within the jurisdiction of the SJVAPCD and will be required to comply with Rules VIII,2010, 3135, 4101, 4002, 4102, 4601, 4641, and 9510
- Central Valley Regional Water Quality Control Board, SWPPP. The proposed Project site is within the area 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 because of Project construction.

2.5 EIR Process

2.5.1 Distribution of NOP

In compliance with Sections 15082 and 15375 of the State CEQA Guidelines, a Notice of Preparation (NOP) has been prepared by the City of Hanford and has been distributed to the State Clearinghouse, Office of Planning and Research, Trustee and Responsible Agencies and other interested parties. The Initial Study and NOP were circulated for a 30-day public review period, which lasted from August 16th to September 16th, 2024. All property owners located within 300 feet of the Project site were notified of the Project. In addition to the distribution of the NOP, the City created a newspaper notice and the notice was posted in the County Clerk-Recorders

office. The NOP included a description of the Project, the location of the Project indicated on an attached map, a web link to the initial study containing the important environmental issues of the Project, and the probable environmental effects of the Project. The NOP is provided in Appendix A1 while the full Initial Study can be found in Appendix A2.

During the NOP Process the City of Hanford received one written comment letter in response to the IS/NOP. The City received a comment letter from the California Department of Fish and Wildlife. A summary of the comment letter can be found in Table 1-2.

2.6 Responsible and Trustee Agencies

PRC Section 21104 requires that all EIRs be reviewed by state responsible and trustee agencies (see also 14 CCR 15082 and 15086[a]). As defined by CEQA Guidelines Section 15381, "the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project." A trustee agency is defined in CEQA Guidelines Section 15386 as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California."

For this Project, the California Department of Fish and Wildlife is a trustee agency, because the Project has the potential to impact plant and wildlife species that are managed and protected by the state. A comment letter from the CDFW received during the 30-day IS/NOP review period can be found in Appendix A1.

2.7 Availability of Draft EIR

The Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for a period of 45 days. Comments may be sent anytime during the 45-day EIR comment period. After completion of the 45-day review period, a Final EIR will be prepared that response to comments on the Draft EIR submitted during the review period and modifies the Draft EIR as necessary. Public hearings on the proposed Project will be held after the completion of the Final EIR. Notice of the time and location of future public hearings will be provided before each public hearing date. All comments or questions about the Draft EIR should be addressed to:

City of Hanford Community Development
317 North Douty Street
Hanford, CA 93230
Telephone: 559-585-2580

Figure 2-1 provides a flowchart of the EIR process. An Initial Study was prepared for the proposed Project and is included in Appendix A2.

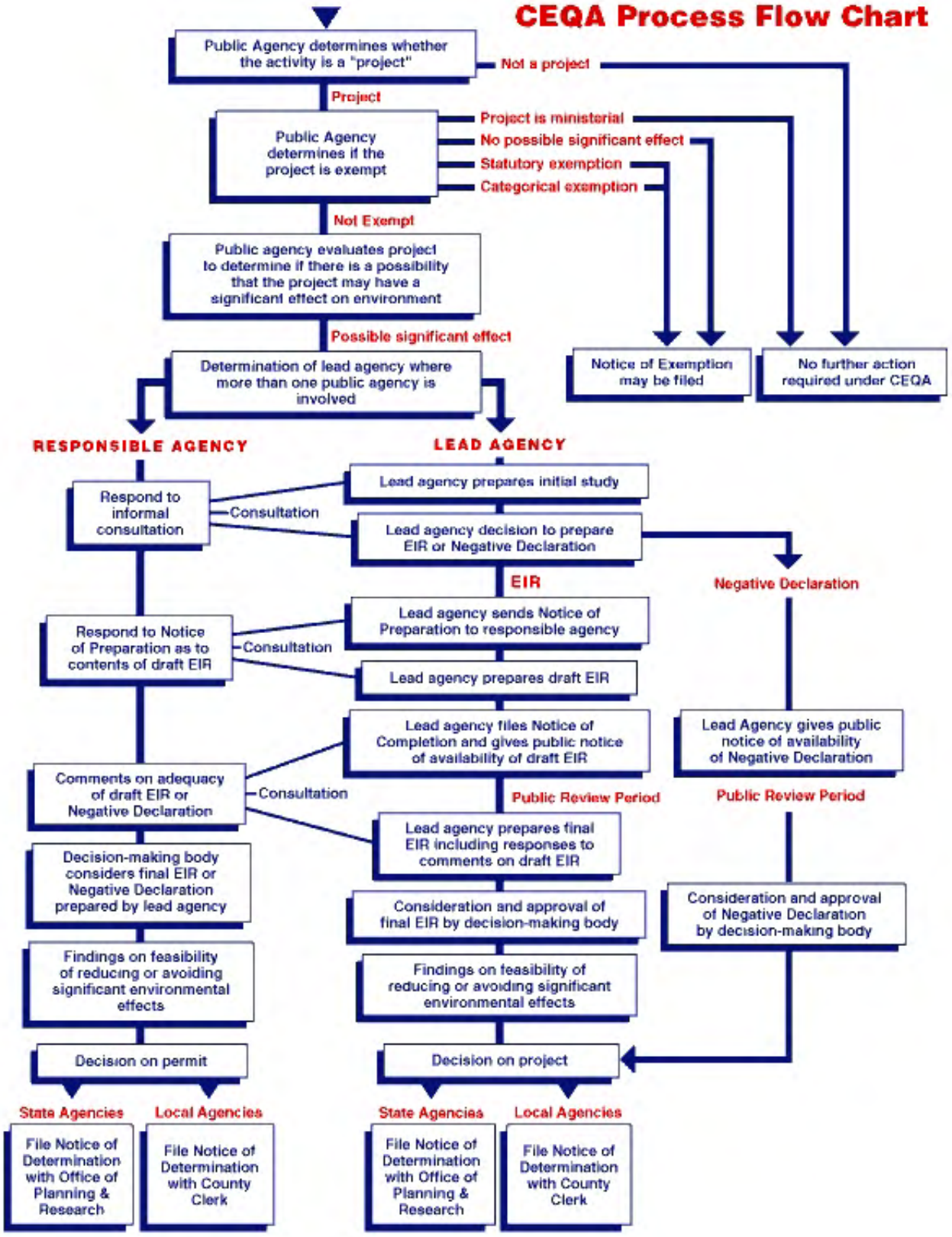

Figure 2-1. The CEQA Process Flow Chart

2.8 Organization of the EIR

This EIR contains the information and analysis required by CEQA Guidelines Sections 15120 through 15132. Each of the required elements is covered in one of the EIR sections or their related appendices, which are organized as follows:

- **Section 1 - Executive Summary.** Provides a description of the proposed Project's environmental review process, a summary of the proposed Project attributes and its impacts, a brief description of the proposed Project's alternatives and identification of the environmentally superior alternative, and a summary of the proposed Project's areas of known controversy and issues in need of resolution.
- **Section 2 – Introduction** contains a summary of the EIR's purpose and the Project objectives as well as comments received during Project scoping.
- **Section 3 – Project Description** provides details on the proposed Project, including the general environmental setting, Project background, construction plan, operation, and maintenance, and required permits and approvals. Section 3 also includes the cumulative scenario, which provides a list of related Projects and describes the methodology used in the cumulative assessment.
- **Section 4 – Environmental Analysis** details environmental setting information, applicable regulations and standards, proposed Project impacts, and proposed mitigation measures for specific resource areas. Section 4.1 provides the approach to the environmental analysis, as well as a discussion of the resource areas for which the proposed Project would result in no impacts or less-than-significant impacts. Detailed analyses for potential direct, indirect, and cumulative environmental impacts of the proposed Project are included in Sections 4.8, 4.9 and 4.10. The Initial Study prepared for the Project is included Appendix A2.
- **Section 5 – Cumulative Effects** provides an analysis of the cumulative effects of the implementation of the proposed Project within the applicable geographic scope.
- **Section 6 – Alternatives Analysis** provides a comparison of the proposed Project's impacts with those of Project alternatives developed by the City of Hanford.
- **Section 7 – Other CEQA Considerations** addresses other applicable CEQA requirements, including an analysis of growth-inducing effects, significant irreversible commitment of resources, and significant effects that cannot be avoided.
- **Section 8 – References** lists all of the informational references cited in this EIR.
- **Section 9 – List of Preparers** lists the preparers of the EIR document

3 Project Description

3.1 Introduction

The Project site is on two parcels that currently hold agriculture uses, an irrigation canal, irrigation equipment, dirt access roads, and a storage building. The site is in the Northern portion of the City of Hanford, within the County of Kings. The proposed Project is on APNs: 007-010-031 and 007-360-016, which are zoned as low-density residential (R-L), medium-density residential (R-M), high-density residential (R-H), neighborhood commercial (C-N) and public facilities (P-F) by the City of Hanford Zoning Ordinance. The City of Hanford 2035 General Plan designates the site for low, medium, and high-density residential uses, neighborhood commercial, and designates approximately 20 acres for educational facilities and 20 acres for open space on the site without a specific location.

3.2 Project Objectives

The Project objectives are to:

- Make productive use of the underutilized property by developing the site with residential, commercial, and public facility uses while staying consistent with the current City of Hanford General Plan and the Kings County Development Code.
- Increase the available single-family and multi-family residential housing stock within the City of Hanford.
- Build an integrated, high quality mixed-use development with a range of low, medium, and high-density residential uses to offer homeownership opportunities attainable to a variety of income levels.
- Connect future development with the existing community, reducing the strain on the utilities.
- Expand the Hanford community.

3.3 Project Description

The Project proposes Low, Medium, and High-Density residential development, Neighborhood Commercial, park and educational land uses. The Project will also feature 12.35 acres of park space, a 14.99-acre school zone, and a 6.18-acre stormwater retention basin. The Project would have 710 low-density residential homes, 216 medium-density residential homes, and 13 acres of high-density residential apartment units. The low-density residential (R-L-5) portion will consist of (126) 11,900 square foot lots, (185) 7,200 square foot lots, and (399) 5,000 square foot lots. The medium density residential (R-M) portion will consist of 216 small-lot homes (4,000 square feet). The Neighborhood Commercial portion will contain 45,000 square feet of

commercial development and include a minimum of 129 parking spaces according to the parking requirements outlined in the Hanford Municipal Code (§17.54.040). The proposed uses include two retail stores, a gas station, a restaurant, a drive-thru restaurant, and an outdoor food court. However, the Project may also include other uses that are permitted or conditionally permitted within the C-N Neighborhood Commercial Zone. The central community park will include soccer/football fields, basketball courts, and playgrounds, but these details have not been finalized.

Additional Project features include marked pedestrian crossings, a high density of intersections, sidewalks throughout the Project site, a 10' bike/pedestrian trailway that connects all Project components, class I bike lanes along the Project frontage, and enhanced pedestrian crossings with easily identifiable signage for pedestrian/bike crossings at the intersections between the trailway and the roadway. This would be used by the residents for accessing different uses for the Project. This trailway will be integrated with the external pedestrian and bike facilities around the project, connecting the residents with the surrounding neighborhood for easy access without vehicular dependency and enhancing the neighborhood's active transportation network. Drought-tolerant landscaping will also be incorporated throughout the site and will be designed in accordance with the landscaping standards provided in the Hanford Municipal Code.

The Project is planned to be built in seven phases, starting in 2025 and ending in 2045, for a total site development and construction period of 20 years (according to the construction timeline presented in CalEEMod Version 2022.1.1.1).

The Project would result in onsite and offsite infrastructure improvements including new and relocated utilities, new residential streets, and a stormwater basin. The Project would improve Fargo Avenue, Flint Avenue, and 12th Avenue bordering the site. The Project would require the demolition of one 650-square-foot storage building.

Table 3-1. Phasing Plan

Phase Number	Construction Dates	Acres Developed (Gross)
1	2025-2029	44.8
2	2029-2032	31
3	2032-2034	24
4	2034-2036	23
5	2036-2037	15.2
6	2037-2042	102
7	2042-2045	64

3.4 Project Location

The proposed Project site is located on approximately 304 acres within the County of Kings in the northern portion of the City of Hanford, South of Flint Avenue, North of Fargo Avenue, West of 12th Avenue and East of the BNSF Railway. The site is approximately 3.2 miles Northwest of Hanford Downtown in a developing area of Hanford. The Project involves construction on approximately 304 acres on Parcels 007-010-031-000 and 007-360-016-000. The site is topographically flat and bounded by agriculture, rural residential homes, and Hanford Christian School to the north and west, single-family homes and vacant land to the south, and single-family homes and the BNSF Railway to the east. The site is currently used for agriculture; however, the site has been designated by the City's General Plan for low, medium, and high-density residential and neighborhood commercial land uses. The existing agricultural uses taking place on the site include walnut orchards, vineyards, and field crops. The site also contains an agriculture irrigation canal, irrigation equipment, dirt access roads and a 650-square-foot storage building.

3.5 Home Details

The planned 710 single-family homes, 218 medium-density residential units and 13 acres of apartment units will follow two architectural styles: contemporary farmhouse and craftsman. The proposed design guidelines for all development types would include a variety of exterior finishes, including wood, rock, and stucco. For the low-density and medium-density homes, there will be a variation in shape, exterior finishes, elevations, and color palette to create visual interest throughout the community. The low-density residences would vary in building design and orientation, and would each include articulated façades, including recessed openings and elements such as balconies, bay windows, porches, and architectural Projections. Variation in architectural style and color palette would provide roughly 10-12 different building appearances, generating visual interest. The high-density residential apartment units will follow the same two architectural styles, and will also vary in exterior finishes, color palette and shape to ensure unique visual character from the adjacent homes. The proposed elevations of the development would be subject to review by the Kings County Community Development Agency Deputy Director Building Official prior to the issuance of construction permits.

Characteristic elements of this design include:

- Windows with wood shutters.
- The use of brick/stone veneer and/or wood siding.
- A distinctive roof over the entry.
- Trim above doors and windows.
- Front porch with wood-like or stucco columns.
- Wooden garage doors
- Unique and varied color palette throughout and within home types

Figure 3-1. Low Density Proposed Home Designs

Figure 3-2. Medium Density Proposed Home Designs

Figure 3-3. High-Density Proposed Home Designs

3.6 Commercial Details

The architectural character of the neighborhood commercial buildings will be designed with two styles: contemporary farmhouse and craftsman. Buildings will have variation in shape, exterior finishes and color palette from adjacent buildings to create visual interest along the streetscape. Landscaping and trees will provide screening and shade for parking areas with one tree per four lineal stalls. The commercial area shall be designed as an integrated shopping center with shared access, parking, lighting, and landscaping. Neighborhood Commercial land uses will comply with the C-N development standards per the Hanford Municipal Code. The plan for the area is conceptual, actual building design will be finalized during site plan review and subject to the standards of the Hanford Municipal Code. See Figure 3-4 below for examples of building styles proposed for the commercial area.

Figure 3-4. Commercial Design Examples

Source: Fargo Village Design Guidelines, 2023 (4Creeks, Inc.)

3.7 Construction Details

As detailed in Table 3-1, the Project will be built in seven phases, spanning over the course of 20 years. For conceptual phasing information, see Table 3-1. The Project will result in on-site and offsite infrastructure improvements including new and relocated utilities. Water, sewer, and storm drain services will be provided bythe City of Hanford via existing lines on Fargo Avenue. A temporary stormwater basin will be located near the commercial area, in the northwest corner of the site. Electricity will be provided by Southern California Edison, and natural gas will be provided by Southern California Gas Company. The proposed new buried utilities and new/extended roads would be built first. This would involve minor grading and trenching, followed by installing new utility lines, backfilling, and paving the roads.

Vehicular access to theProject is available via Fargo Avenue, Flint Avenue, and 12th Avenue. The site will have an access point from the south on Fargo Ave,from the west on 12th Ave, and two access points from the north on Flint Ave. Two smaller access points into the commercial area will be available on 12th and Fargo Avenues. The Project includes new streets, courts,

roundabouts, and pathways that provide full access to the Project site. A street will loop around the Project site to connect all parts of the development. A series of pedestrian sidewalks and trails would be provided throughout the site.

In accordance Table 17.54.040 of Title 17 (Zoning), the single-family component (926) will contain 2 spaces per dwelling unit, which will be part of the driveway component and on-street parking will be available. The apartment complex will contain at least 378 spaces total, and of those spaces, 189 will be covered spaces. This is in accordance with the requirements for 2-bedroom multifamily dwellings from Title 17. The neighborhood commercial component will contain a minimum of 129 spaces, which satisfies the provisions of the "Integrated Shopping Center" category in Table 17.54.040 (1 space/350 S.F.).

During construction, workers will utilize existing parking areas and/or temporaryconstruction staging areas for parking vehicles and equipment. The Project will be responsible for the construction of internal roadways as well as for potential improvements to surrounding roadways to accommodate the Project. The Project includes sidewalks, a center median, and landscaping along the frontage roads and within the site itself, per City standards. Completing road extensions first would ensure that construction-related trips can use the proposed new extension of Flint Avenue, Fargo Avenue and 12th Avenue to access home sites. Once that is complete, the homes will be constructed in seven phases starting with the construction of the low-density residential component. Construction for all 1,146 of the homes is expected to last approximately 20 years. Construction is expected to be completed by the end of 2040.

3.8 Cumulative Development Scenario

Table 3-2 lists current development Projects within the area of Hanford. Currently, there are three significant Projects in the area. The Downtown Improvements Project is in Downtown Hanford (approximately 2.3 miles to the south) and proposes street improvements which includes a roundabout, street reconstruction, parking modifications and sidewalk improvements. Improvements were completed in August 2023. Second, the Hanford Place Project (approximately 2.5 miles south of the Project) proposes the construction of a medical and mixed-use development which would include 15 buildings for a medical outpatient clinic, a hotel and conference center, a specialized education facility, retail, medical office, skilled nursing and assisted living facility, and multi-family residences. Lastly, the Tentative Tract Map 938 Project, approximately 3.6 miles southeast of the Project, proposes the construction of 457 single-family residences, internal roads, a drainage retention basin, and a 5.82-acre park. A Final EIR has been completed for the Tentative Tract Map 938 Project and is awaiting adoption by the City of Hanford. Depicted in Figure 3-9 depicts the location of these Projects.

Table 3-2. City of Hanford Cumulative Project List

Project	Location	Proposed Zone	Number of Residential Units	Map No.
Downtown Improvements Project	North Douty Street and 7th Street	MX-D	N/A	1
Hanford Place	South of San Joaquin Valley Railroad, North of SR-198, Campus Drive cuts through site (north/south direction)	C-H	304	2
Lunaria/Tentative Tract Map 938	South of Hanford Armona Road, east of 10 1/2 Avenue	R-L-5	457	3
Stonehaven Annexation	Within Hanford city limits, south of Hanford Armona Road, between 12th & 13th Avenues.	R-L-5	82	4
Liberty Pointe	North of Grangeville Boulevard, west of the railroad tracks, east of Kings Road.	R-L-8	55	5
Grangeville Mixed Use Development	Northwest of the intersection of Grangeville Boulevard and Centennial Drive within the City of Hanford.	MX-N	64 MFR[1] 1.25-acre commercial zone	6
Silicon Valley Ranch	Bound by Hanford Armona Road to the north, Greenbrier Road to the east, and 13th Avenue to the west.	R-L-5	326	7
Hanford Dairy Manufacturing Plant	San Joaquin Valley Railroad to the north, Lacey Boulevard to the south, and planned High-Speed Rail to the east. (Unincorporated Kings County)	IL	N/A	8
Neves Subdivision	Northwest corner of Fargo Avenue and 12th Avenue	AL-10 (County)	615	9

[1] Multi-family residential

Figure 3-5. Regional Location Map

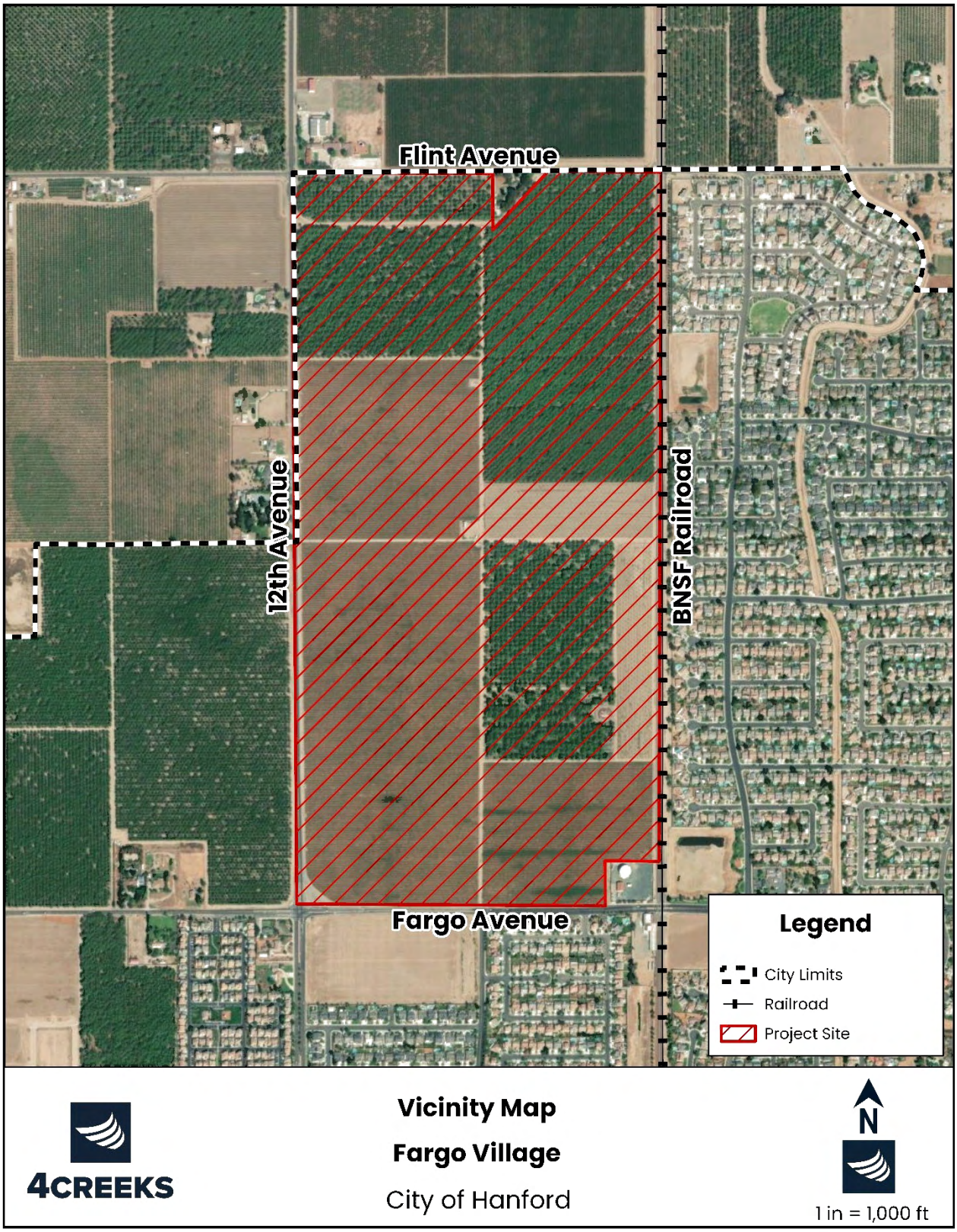

Figure 3-6. Project Vicinity Map.

Figure 3-7. Western Portion of the Fargo Village Development

Figure 3-8. Eastern Portion of the Fargo Village Development

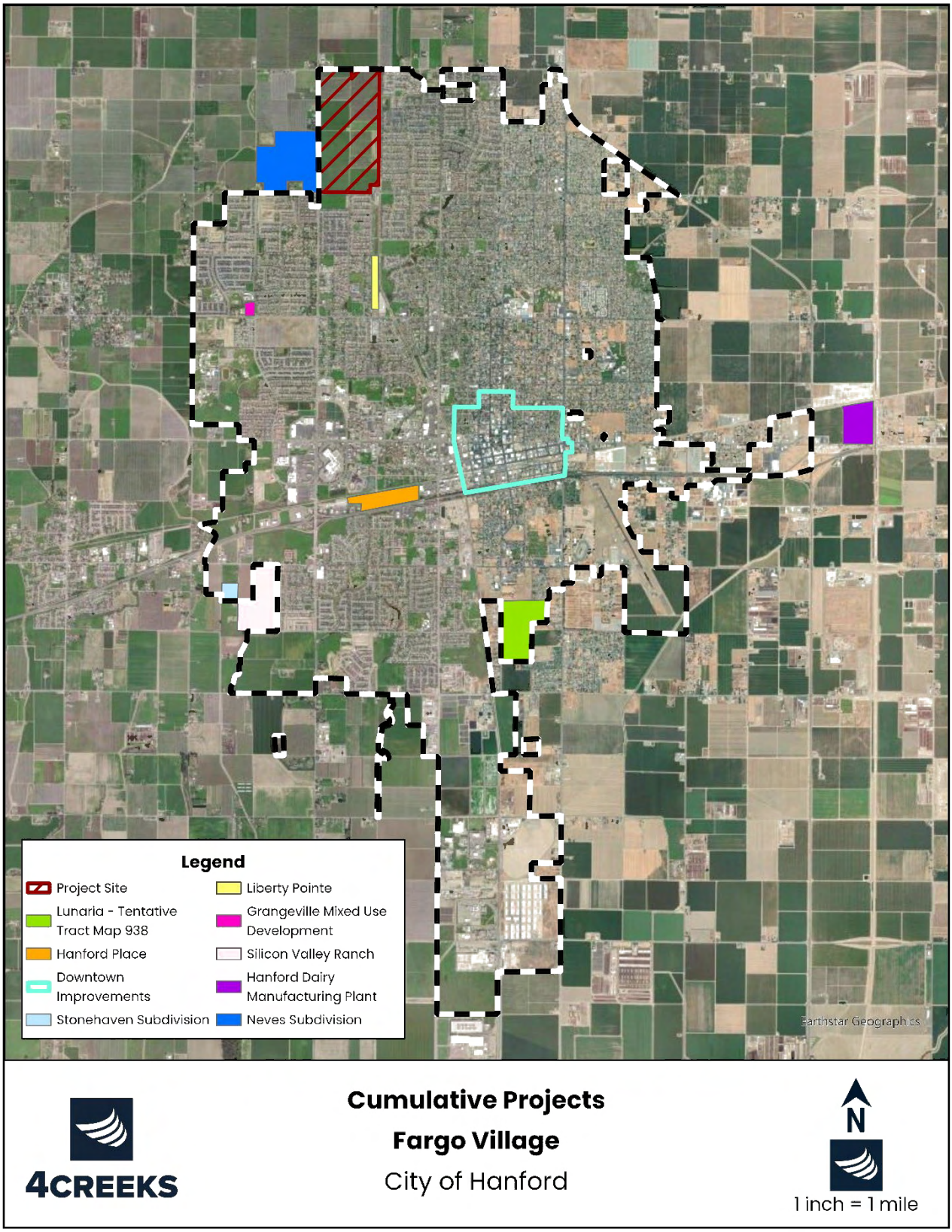

Figure 3-9. Cumulative Projects

4 Environmental Analysis

Section 4 presents the analysis of the potential direct, indirect, and cumulative environmental impacts of the proposed Project. Addressed in Section 5 are the Alternatives. CEQA requires that an EIR address potentially significant environmental effects; this analysis is included in Sections 4.8-4.10 of this EIR.

For all remaining environmental resource areas, this EIR has determined that the impacts of the proposed Project would not be significant. Appendix A2, Initial Study, provides a summary and explanation of the conclusions for each of these resource areas (as allowable under CEQA Guidelines Section 15128). CEQA Guidelines Section 15128 also requires that an EIR briefly explain the reasons why certain effects associated with a Project have been determined not to be significant, and therefore not discussed in detail in the EIR. As presented in Appendix A2, Initial Study, the proposed Project would result in no impact, less than significant impacts, or less than significant impacts with mitigation to the following resources:

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities
- Wildfire

Presented in Appendix A2 (Initial Study) are descriptions of each of these resources and an explanation of why the proposed Project would not result in significant impacts.

4.1 Organization of Section 4

Based on the analysis presented in the Initial Study (Appendix A2), this EIR addresses three issues, transportation, air quality, and hazards & hazardous materials impacts associated with the proposed Project, specifically impacts related to operational vehicle miles traveled (VMT) and toxic air contaminants. This detailed analysis is presented in Sections 4.8 (Transportation), 4.9 (Air Quality), and 4.10 (Hazards & Hazardous Materials).

4.2 Environmental Assessment Methodology

The methodology used to determine potential Project impacts identified in the Initial Study (Appendix A2) and Section 4 of this EIR comprises four key components. Each of these components is summarized below and discussed under the resource area addressed in Section 4.

- **Environmental Setting.** In most cases, the description of existing conditions in the environmental setting focuses on the immediate vicinity of the Project site (sensitive receptors, public roadways, existing water system infrastructure, etc.). For some resources, such as Air Quality, as discussed in Section 4.9, regional information may also be presented.
- **Regulatory Setting.** This includes a description of federal, State, and local regulatory framework applicable to the assessment of Project impacts.
- **Thresholds and Methodology.** Resource-specific thresholds, where appropriate, are used to evaluate the significance of environmental impacts. They are based on available County of Kings or Hanford thresholds, augmented where appropriate with those identified in the Initial Study included in Appendix G of the CEQA Guidelines (refer to Appendix A2).
- **Project Impacts.** Each resource area analysis identifies direct and indirect impacts that would occur absent mitigation measures. Direct impacts are those that are caused by and immediately related to the proposed Project. Indirect impacts would occur later in time or farther removed in distance but are still reasonably foreseeable effects of the proposed Project. The following determinations are used for classifying Project-related impacts:
    - *Significant and Unavoidable Impact*: an adverse impact that cannot be mitigated to a level that is less than significant;
    - *Less than Significant Impact with Mitigation*: that can be mitigated to a level of less than significant through the implementation of recommended mitigation measures;
    - *Less than Significant Impact*: an impact that is adverse but less than significant and mitigation is therefore not required;
    - *Beneficial Impact*: an impact that improves environmental conditions either directly or indirectly and mitigation is therefore not required; and

    - *No Impact*: circumstances under which no direct or indirect effect would occur, and mitigation is therefore not required.
- **Mitigation Measures.** Identifies mitigation measures to reduce significant adverse impacts to the extent feasible.
- **Level of Significance after Mitigation.** Identifies the level of significance under CEQA after the implementation of environmental commitments and mitigation measures identified by the City of Hanford.

4.3 Impact Significance

Based on the impact assessment methodology presented above, each specific impact for each resource area is assigned to one of the following impact levels:

- **Class I: Significant impact:** cannot be mitigated to a level that is less than significant.
- **Class II: Significant impact:** can be mitigated to a level that is less than significant through the implementation of recommended mitigation measures.
- **Class III: Adverse impact:** There is an impact, but it is less than significant so mitigation is not normally recommended.
- **Class IV: Beneficial impact;** mitigation is not required.
- **No Impact:** The specific impact question or resource would not be affected by the proposed Project.

4.4 Cumulative Scenario and Methodology

Cumulative effects are those impacts from related Projects that would occur in conjunction with the proposed Project. To document the process used to determine cumulative impacts, Section 5 provides the CEQA requirements, the methodology used in the cumulative assessment, and the Projects identified and applicable to the cumulative analysis. The cumulative analysis includes issues pertaining to transportation, air quality and hazards and hazardous materials.

4.5 CEQA Requirements

CEQA requires that cumulative impacts be analyzed in an EIR when the resulting impacts are cumulatively considerable, and therefore, potentially significant. The discussion of cumulative impacts must reflect the severity of the impacts, as well as the likelihood of their occurrence; however, the discussion does not need to be as detailed as the discussion of environmental impacts attributable to the proposed Project alone. Further, the discussion is intended to be guided by the standards of practicality and reasonableness. As stated in Public Resources Code Section 21083(b), "a Project may have a significant effect on the environment if the possible effects of a Project are individually limited but cumulatively considerable."

According to Section 15355 of the 2021 CEQA Statute and Guidelines:

> *Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.*
>
> *(a) The individual effects may be changes resulting from a single Project or a number of separate Projects.*
> *(b) The cumulative impact from several Projects is the change in the environment which results from the incremental impact of the Project when added to other closely related past, present, and reasonably foreseeable probable future Projects. Cumulative impacts can result from individually minor but collectively significant Projects taking place over a period of time.*

Further, according to CEQA Guidelines Section 15130 (a)(1):

> *As defined in Section 15355, a cumulative impact consists of an impact which is created as a result of the combination of the Project evaluated in the EIR together with other Projects causing related impacts. An EIR should not discuss impacts which do not result in part from the Project evaluated in the EIR.*

In addition, as stated in the CEQA Guidelines, Section 15064(h)(4) it should be noted that:

> *The mere existence of significant cumulative impacts caused by other Projects alone shall not constitute substantial evidence that the proposed Project's incremental effects are cumulatively considerable.*

Therefore, the cumulative discussion in an EIR focuses on whether the impacts of the Project under review are cumulatively considerable within the context of impacts caused by other past, present, or future Projects. The technical analysis in Section 5 (Cumulative Effects) includes the discussion of the potential cumulative impacts associated with transportation, air quality, and hazardous materials.

4.6 Mitigation Measures

Where potentially significant impacts are identified in this EIR or the Initial Study (Appendix A2), mitigation measures are recommended. Each mitigation measure defines the specific requirements to reduce impacts and defines the relevant milestone (the timeframe within which the measure must be implemented).

4.7 Mitigation Monitoring

Public Resources Code Section 21081.6 establishes two distinct requirements for agencies involved in the CEQA process. Subdivisions (a) and (b) of the section relate to mitigation monitoring and reporting, and the obligation to mitigate significant effects where possible. Pursuant to subdivision (a), whenever a public agency completes an EIR and makes a finding pursuant to Section 21081(a) of the Public Resources Code taking responsibility for mitigation identified in the EIR, the agency must adopt a program of monitoring or reporting, which will ensure that mitigation measures are complied with during the implementation of the Project.

As required by CEQA and depending on the decision on the proposed Project, the County would adopt a mitigation and monitoring program to ensure compliance with the recommended mitigation measures identified in this EIR including the measures identified in the Initial Study (Appendix A2). The mitigation and monitoring program for the proposed Project will be included in Appendix D.

4.8 Transportation

This section describes the surface transportation qualities of the Project vicinity and evaluates the significance of impacts related to VMT that may occur because of the proposed Project. As provided in the Traffic Impact Study with the Initial Study as Appendix A2, the proposed Project is found to not result in potential impacts related to adopted policies, plans, or programs supporting the transportation and circulation system, increase hazards due to a geometric design feature, or impact the flow of emergency service vehicles.

This analysis utilizes the findings of the *Singh Development Project Vehicle Miles Traveled Analysis* as well as the *Traffic Impact Study* prepared by LSA Associates which were prepared in May and September of 2023. Both documents are provided with the Initial Study in Appendix A2.

4.8.1 Environmental Setting

Commute Characteristics: City of Hanford

As shown in Figure 4-1, of the 21,225 working residents in Hanford, 15,685, or 73.9% work outside of the City's limits, while only 5,540, or 26.1% work inside the City. Of the 15,395 jobs in Hanford, 9,855, or 64% of the employees are commuters from other cities, and the remaining proportion are those who both live and work in the City, as mentioned previously.

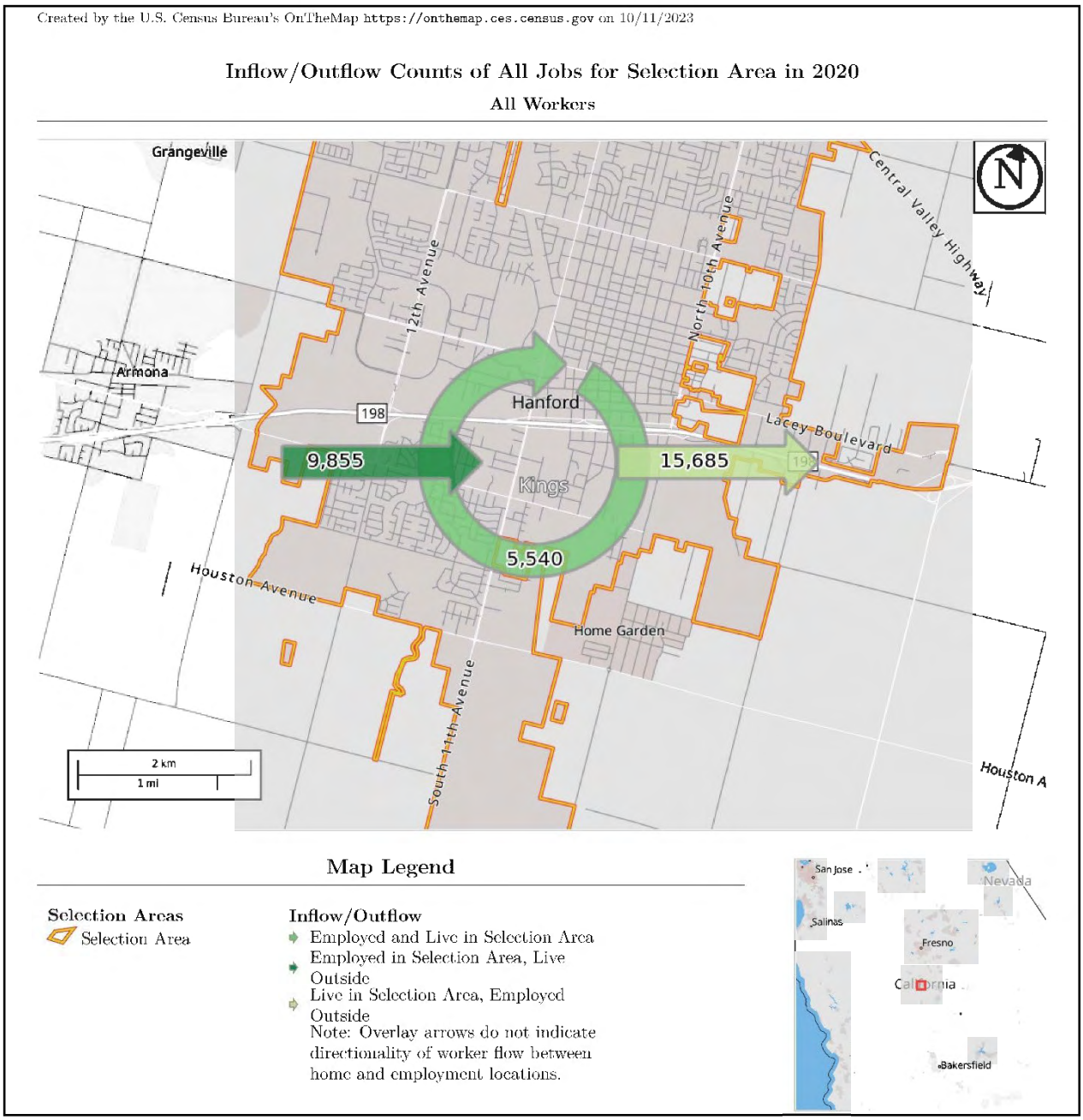

Figure 4-1. Daily Commute Inflow and Outflow, City of Hanford

These commute characteristics have implications for the VMT metrics because they affect the distance that commuters need to travel to reach their jobs. As shown in the tables below, many people who live in Hanford do not work in the City and therefore travel large distances for work, and many people who work in Hanford reside outside of the City and travel great distances for work. Table 4-1 summarizes the commute distance for people who *live* in Hanford, whether they work in the City or elsewhere, while Table 4-2 summarizes commute distance for people who *work* in Hanford, whether they live in the community or elsewhere. Most of the workers that commute into Hanford come from Lemoore or unincorporated areas. Approximately 73.9% of

those who live in Hanford work outside of City limits, and roughly 64% of the employees in Hanford are commuting from other cities. Therefore, the majority of the workforce in Hanford and the surrounding area are commuters rather than locally employed residents.

Table 4-1. Commute Distance for People Who Live in the City of Hanford

Commute Distance	***Count***	***Share***
Total All Jobs	21,225	100%
< 10 Miles	9,194	43.3%
10-24 Miles	4,708	22.2%
25-50 Miles	3,285	15.5%
> 50 Miles	4,038	19.0%

Table 4-2. Commute Distance for People Who Work in the City of Hanford

Commute Distance	***Count***	***Share***
Total All Jobs	15,395	100%
< 10 Miles	7,784	50.6%
10-24 Miles	2,992	19.4%
25-51 Miles	2,377	15.4%
> 50 Miles	2,242	14.6%

Source: U.S. Census Bureau, OnTheMap Application, https://onthemap.ces.census.gov/

Baseline VMT: County of Kings

Table 4-2 presents approximate VMT estimates for Kings County. As shown, the VMT per capita is lower than the total VMT per employee. VMT per employee represents the average commute distance. This shows that commuter trips are the longest distances driven in the county.

Table 4-2. VMT Metrics in Kings County

VMT Metric	***Geography***	***Average VMT***
Total VMT Per Capita	Kings County	9.6
VMT per Employee	Kings County	17.7

Source: Kings County Online VMT Mapping Tool (Found Online Here)

4.8.2 Regulatory Setting

State Regulations

Following years of development and public comment, the California Office of Planning and Research (OPR) and the Natural Resources Agency have issued new CEQA Guidelines for analyzing transportation impacts. These new regulations represent a major shift in approach

to analyzing transportation impacts under CEQA. Beginning July 1, 2020, all CEQA lead agencies must discontinue analysis of transportation impacts based on congestion effects tied to Level of Service (LOS). Rather, analysis of a Project's transportation impacts must now be based on vehicle miles traveled or VMT. VMT analyzes the distance that vehicles travel to and from a Project, rather than congestion levels at intersections and along roadway segments. OPR's enacted new guidelines for assessing transportation impacts specify that traffic congestion can no longer be considered in assessing impacts under CEQA.

Kings County Association of Governments

The KCAG serves as the state-designated Regional Transportation Planning Agency (RTPA) and the federally-designated Metropolitan Planning Organization (MPO). The Regional Transportation Plan (RTP) contains a constrained list of transportation Projects (that are federally funded), air quality determination, and set policies for spending federal and state funds. The RTP, with a 2035 planning horizon, is the key that unlocks federal and state funding for transportation Projects. The RTP is intended to serve many purposes:

- Provide the foundation for transportation decisions by local, regional, and state officials.
- Document the region's mobility needs and issues.
- Identify and attempt to resolve regional issues and provide policy direction for local plans.
- Document the region's goals, policies, and objectives for meeting current and future transportation mobility needs.
- Set forth an action plan to address transportation issues and needs consistent with regional and state policies.
- Identify transportation improvements in sufficient detail to aid in the development of the State Transportation Improvement Program (STIP) and to be useful in making decisions related to the development and growth of the region.
- Identify those agencies responsible for implementing the action plans.
- Document the region's financial resources needed to meet mobility needs.

City of Hanford General Plan Transportation and Circulation Element (2035)

The City of Hanford General Plan Transportation and Circulation Element contains the following goals and policies pertaining to maintaining and enhancing the City's transportation system:

- **Goal T1:** A comprehensive, multi-modal motorized and non-motorized transportation system that improves the quality of life and facilitates the efficient movement of people and goods.
- **Goal T3:** City streets that meet the needs of bicyclists, pedestrians, children, motorists, persons with disabilities, the elderly, users of public transportation, and commercial goods movers.

- **Policy T1 Coordination of Circulation and Land Use:** Develop a circulation network that reinforces the desired land use pattern for Hanford, as identified in the land use element.
- **Policy T29 Maximum Level of Service:** Maintain a peak hour Level of Service E on streets and intersections within the area bounded by Highway 198, 10th Avenue, 11th Avenue, and Florinda Avenue, inclusive of these streets. Maintain a peak hour Level of Service D on all other streets and intersections with the Planned Growth Boundary.
- **Policy T39 Accommodating All Modes of Traffic:** Plan, design, and construct new transportation improvement Projects to safely accommodate the needs of pedestrians, bicyclists, transit riders, motorists and persons of all abilities.
- **Policy T40 Pedestrian and Bicycle Placemaking:** Promote pedestrian and bicycle improvements that improve connectivity between neighborhoods, provide opportunities for distinctive neighborhood features, and foster a greater sense of community.
- **Policy T41 Streetscape Enhancements:** Strive to improve the visual character of roadway corridors by improving streetscapes with amenities such as street trees, pedestrian-scaled lighting, underground utilities, water-efficient landscaping, and streetscape furniture.
- **Policy T48 Traffic Calming:** Consider the use of traffic calming designs such as roundabouts, bulb-outs, and other traffic calming designs, where they will improve the operation or LOS of a street.
- **Policy T49 Subdivision Connectivity:** Design subdivisions to maximize connectivity both internally and with other surrounding development.
- **Policy T51 Alternative Design Standards:** Consider alternative roadway design standards for new residential and mixed-use development for future streets that may include:
    - Narrower street widths on local roadways. Smaller turning radii geometrics on street intersections to improve safety for pedestrians.
    - Tree lined streets in parkways between the curb and sidewalk.
    - Roundabouts in lieu of traffic signals where appropriate conditions exist to maximize intersection efficiency, maintain continuous traffic flow, and reduce accident severity

Kings County General Plan (2035)

The 2035 General Plan includes policies and actions intended to increase traffic calming and enhance walkability throughout the County.

- **Circulation Policy A1.1.4:** Consider public safety, retention, and maintenance of the existing County transportation system, and system efficiency as guiding criteria in evaluating County transportation improvement Project priorities.

- **Circulation Policy A1.1.6:** Work closely with Caltrans, Kings County Association of Governments, and the City of Hanford to develop an alternative design for the 13th Avenue and State Route 198 interchange to enhance traffic safety and accommodate future growth demands.
- **Circulation Policy A1.2.1:** Coordinate land use planning with planned transportation facilities to make efficient use of the transportation system and reduce total vehicle miles traveled, vehicle emissions, and energy use through improved accessibility to schools, job centers, and commercial services.
- **Circulation Policy A1.3.2:** Require proposed developments that have the potential to generate 100 peak hour trips or more to conduct a traffic impact study that follows the most recent methodology outlined in Caltrans Guide to the Preparation of Traffic Impact Studies.
- **Circulation Policy B1.2.1:** Adopt traffic calming street design standards into the County's "Improvement Standards" to make available "Pedestrian Friendly" street design alternatives along Community District streets.
- **Circulation Policy B1.2.3**: Integrate pedestrian infrastructure that includes sidewalks, tree lined streets, and traffic calming crossings to balance both car and people use of neighborhood streets in new mixed use development.
- **Circulation Policy B1.3.1:** New development shall make circulation system improvements or pay its fair share to ensure maintenance of acceptable levels of service.
- **Circulation Policy C1.3.2:** Centralize new development near public transit stops within Community Districts as identified in each respective Community Plan.
- **Circulation Policy C1.3.4:** Coordinate transit route and stops with other transportation modes as defined in each Community Plan.
- **Circulation Policy C1.4.1:** Identify and plan for pedestrian and bicycle pathways in strategic locations within Community Districts to connect residents to commercial businesses, community gathering places, and educational facilities.

4.8.3 Thresholds and Methodology

The impact analysis provided in Chapter 4.8.4 is based on the application of the following California Environmental Quality Act (CEQA) Guidelines Appendix G, which indicates that a project would have a significant impact on air quality if it would:

a) *Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.*
b) *Conflict or be inconsistent with the CEQA guidelines Section 15064.3, Subdivision (b).*
c) *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).*
d) *Result in inadequate emergency access.*

Impact Assessment Methodology

The Kings County Association of Governments (KCAG) VMT methodology for the proposed Project is based on an origin-destination (OD) VMT methodology, which estimates the VMT generated by land uses in a specific geographic area, known as a traffic analysis zone (TAZ), or a larger geographic area such as Kings County. All vehicles traveling to/from the defined geographic area are tracked within the Kings County Association of Governments (KCAG) model, and the number of trips and length of trips is used to calculate the OD VMT.

The KCAG 2018 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) trip-based model is a travel demand forecasting model with socioeconomic and transportation network inputs, such as population, employment, and the regional and local roadway network, that estimates current travel behavior and forecasts future changes in travel demand. The current KCAG model has 2015 as the base year and 2042 as the forecast year and can be used to estimate VMT for the current year 2025 conditions. The 2035 model contains the planned transportation improvements in the RTP and the growth Projections in the SCS. KCAG created an online VMT mapping tool (Kings County Association of Governments n.d.)that identifies VMT per capita and VMT per employee by traffic analysis zone (TAZ). KCAG's mapping tool was created utilizing trip-based transportation models created for the eight San Joaquin Valley MPOs to satisfy the requirements of SB 375. The KCAG model traffic validation is based on several criteria, including vehicle miles of travel, total volume by road type, and percent of links within acceptable limits.

When calculating VMT for a Project, the KCAG's VMT methodology for this Project matches the methodology used to establish the Baseline VMT metrics (as summarized in Table 4-3). For residential projects in the Kings County, VMT is defined as a measurement of VMT per capita, which reflects all trips that begin or end at a residential unit within the County. All home-based auto vehicle trips are traced back to the residence of the trip-maker and then divided by the population within the geographic area to get the efficiency metric of VMT per capita. Following the VMT analysis, the VMT per capita of the Project TAZ is then compared to the KCAG's Baseline VMT to determine if it exceeds the impact threshold.

The City has also developed the *City of Hanford VMT Thresholds and Implementation Guidelines* (VMT Guidelines) in November 2022. The methodology and significant threshold criteria identified in the VMT Guidelines was used by LSA Associates for the VMT Analysis (2023) prepared for the Project. According to the VMT Guidelines, each component of the Project must be evaluated separately for mixed-use Projects, so this method was applied. According to the guidelines, the retail and commercial component can be screened out using the 55,000 SF screening criteria for retail Projects. Additionally, the educational and park/open space land uses could be screened out using the Specific Land Use Screening criteria provided by the VMT Guidelines. The residential component, however, could not be screened out because it did not meet any of the screening criteria identified in the guidelines.

The VMT guidelines also established Kings County as the region and 13% as the threshold for comparison of VMT metrics. Therefore, if the Project VMT per capita exceeds 87% of corresponding Kings County baseline average VMT per capita, the Project would have a significant VMT impact. For Projects that require a detailed VMT analysis, the guidelines recommend the use of KCAG model to conduct the VMT analysis. Therefore, the KCAG model was used for the VMT evaluation of the Project. Numerical values for the VMT metric threshold have been obtained from Table E: Significance Thresholds for VMT Analysis of the guidelines.

CEQA Guidelines Revisions (Section 15064.3 (a))

In January 2019, the Natural Resources Agency certified the Office of Planning and Research's (OPR) proposed revisions, which resulted in the creation of Section 15064.3 of the CEQA Guidelines. Section 15064.3(a) describes its purpose as:

> "This section describes specific considerations for evaluating a Project's transportation impacts. Generally, vehicle miles traveled are the most appropriate measure of transportation impacts. For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a Project. Other relevant considerations may include the effects of the Project on transit and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a Project's effect on automobile delay shall not constitute a significant environmental impact."

OPR created a Technical Advisory (December 2018) (TA) as guidance for evaluating vehicle miles traveled (VMT) impacts. VMT significance thresholds are recommended by OPR beginning on page 8 of the TA. Beginning on page 10 of the TA, OPR states:

> "Public Resources Code section 21099 directs OPR to propose criteria for determining the significance of transportation impacts. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in selecting a significance threshold that may be appropriate for their particular Projects. While OPR's Technical Advisory is not binding on public agencies, CEQA allows lead agencies to 'consider thresholds of significance . . . recommended by other public agencies, provided the decision to adopt those thresholds is supported by substantial evidence.' (CEQA Guidelines, § 15064.7, subd. (c).) Based on OPR's extensive review of the applicable research, and in light of an assessment by the California Air Resources Board quantifying the need for VMT reduction in order to meet the State's long-term climate goals, OPR recommends that a per capita or per employee VMT that is fifteen percent below that of existing development may be a reasonable threshold."

> "Fifteen percent reductions in VMT are achievable at the Project level in a variety of place types." [citing CAPCOA (2010) Quantifying Greenhouse Gas Mitigation Measures, p. 55]
>
> "Moreover, a fifteen percent reduction is consistent with SB 743's direction to OPR to select a threshold that will help the State achieve its climate goals. As described above, section 21099 states that the criteria for determining significance must 'promote the reduction in greenhouse gas emissions.' In its document California Air Resources Board 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals, CARB assesses VMT reduction per capita consistent with its evidence-based modeling scenario that would achieve State climate goals of 40 percent GHG emissions reduction from 1990 levels by 2030 and 80 percent GHG emissions reduction levels from 1990 by 2050. Applying California Department of Finance population forecasts, CARB finds per-capita light-duty vehicle travel would need to be approximately 16.8 percent lower than existing, and overall per-capita vehicle travel would need to be approximately 14.3 percent lower than existing levels under that scenario. Below these levels, a Project could be considered low VMT and would, on that metric, be consistent with 2017 Scoping Plan Update assumptions that achieve climate state climate goals."

California Air Resources Board (CARB) Requirements

The California Air Resources Board has identified the following goals for greenhouse gases and air quality:(SB 375 Regional Targets n.d.))

> "Senate Bill 375 requires CARB to develop and set regional targets for greenhouse gas (GHG) emission reductions from passenger vehicles. CARB has set regional targets, indexed to years 2020 and 2035, to help achieve significant additional GHG emission reductions from changed land use patterns and improved transportation in support of the State's climate goals, as well as in support of statewide public health and air quality objectives. Metropolitan planning organizations (MPOs) must prepare a sustainable communities strategy (SCS) that will reduce GHG emissions to achieve these regional targets, if feasible to do so."

The CARB identified a fifteen percent (15%) target for GHG emission reduction from passenger vehicles (indexed to the year 2035) for the Kings County Association of Governments (KCAG) MPO.

OPR's recommendation "that a per capita or per employee VMT that is fifteen percent below that of existing development" is a valid threshold for the County of Kings because it is consistent with CARB's fifteen percent (15%) GHG vehicle emission reduction target to which KCAG's

members are subject. It is reasonable to conclude that a reduction in VMT directly corresponds to a reduction in GHG emissions from passenger vehicles and that a proposed Project that is estimated to generate a per capita or per employee VMT that is more than fifteen percent (15%) below that of existing development will result in GHG emission reduction consistent with CARB's fifteeen percent (15%) reduction target for the KCAG metropolitan planning organization (MPO). For purposes of the County's VMT evaluation efforts, it is appropriate to utilize OPR's recommended fifteen-percent-below-existing development VMT threshold because it is consistent with CARB's applicable GHG emission reduction target.

Although a fifteen percent reduction in VMT per capita is recommended by the OPR and CARB, the City of Hanford has adopted its own VMT Guidelines (November 2022) that are locally applicable and effectively reduce GHG emissions to achieve regional targets.

Table 4-3 presents the population inputs for the proposed Project. The Project area population was estimated by referring to the population per household in Hanford from the 2020 U.S. Census.

Table 4-3. Land Use Inputs for the Proposed Project

Land Use	***Size***	***Population***
Single-Family Detached Housing	710 Units	2871
Multi-Family Housing	436 Units	682
Total	**1,146 Units**	**3,553**

4.8.4 Project Impacts

Threshold 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 (Class II). The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, as discussed below. Impacts would be *less than significant.*

KCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The Project would be consistent with the goals and objectives outlined in the 2022 KCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) as analyzed in Table 4-4, below. Some of the pedestrian and bicyclist-oriented features are marked pedestrian crossings, a high density of intersections, sidewalks throughout the Project site, a trailway that connects all Project components, and 2.5 miles of bike lanes along the Project frontage. At the intersections between the vehicular street network and the trail loop, the

Project proposes to include enhanced pedestrian crossings with easily identifiable signage for pedestrian/bike crossings.

Table 4-4. KCAG RTP/SCS Consistency Analysis

Program Goal or Policy	Consistency of Proposed Project
Overall Goal of Program	
Goal 1: To develop a transportation system that encourages and promotes the safe and efficient development, management, and operation of surface transportation systems to equitably and safely serve the mobility and accessibility needs of people and freight (including meeting the Americans with Disabilities Act requirements, accessible pedestrian walkways, and bicycle transportation facilities) and foster economic growth and development, while minimizing transportation-related fuel consumption, air pollution, and greenhouse gas emissions.	*Consistent.* The Project will foster economic growth by providing new development while maintaining a pedestrian and bicycle-friendly community that allows for greater accessibility to commercial goods due to a variety of land uses on the site.
Maintenance Objectives	
Objective 1: Shorten the travel time required to move people and goods on the existing system.	*Consistent.* The Project proposes low, medium, and high-density residential, commercial, educational and park land uses on the site, with a continuous pedestrian network connecting all land uses. The diversity of land uses on the site effectively shortens travel time for nearby residents
Objective 3: Increase the safety of the existing system.	*Consistent.* As mentioned previously, the Project proposes a variety of features that promote safety for bicyclists, pedestrians and motorists. These include marked pedestrian crossings, a high density of intersections, sidewalks throughout the Project site, a trailway that connects all Project components, and 2.5 miles of bike lanes along the Project frontage. At the intersections between the vehicular street network and the trail loop, the Project proposes to include enhanced pedestrian crossings with easily identifiable signage for pedestrian/bike crossings.

System Improvement Objectives	
Objective 3: Facilitate pedestrian and bicycle travel	*Consistent.* See Objective 3 under "Maintenance Objectives", above.
Societal Impacts Objectives	
Objective 4: Complement the long-range land-use policies of local general plans.	*Consistent.* There will be no conflicts with the long-range land use policies outlined by the City of Hanford General Plan. The Project's proposed land uses do not conflict with the City designated land use and zoning for the site.

City of Hanford General Plan Transportation & Circulation Element

The Project would be consistent with the applicable goals and policies of the City's General Plan Transportation and Circulation Element. The Project would not hinder the City's ability to develop a safe, efficient, and affordable transportation system throughout the community. The Project also provides improved pedestrian and bicycle facilities in addition to roadway improvements that meets the City's goals of creating streets that meet the needs of bicyclists, pedestrians, children, and motorists.

Road Classification System

The City of Hanford utilizes a standard hierarchal roadway system which includes State Highways, Arterial Streets, Collector Streets, Local Streets, and Alleys. All street facilities within the City serve to provide vehicle movement and land access.

Although CEQA Guidelines no longer use level of service (LOS), or a Project's effect on automobile delays as a metric to measure significant environmental impacts for transportation, an evaluation of the Project's impact on LOS has been included in the Traffic Study to evaluate the Project's consistency with General Plan Policy T29:

> *Maximum Level of Service*: *Maintain a peak hour Level of Service E on streets and intersections within the area bounded by Highway 198, 10th Avenue, and Florida Avenue, inclusive of these streets. Maintain a peak hour Level of Service D on all other streets and intersections with the Planned Growth Boundary*.

The Project site is located toward the northwest edge of town and outside the area identified to maintain a LOS E and therefore for the study area, LOS D have been considered as the LOS standard. The City of Hanford recognizes as the population grows and there is a push to design streets for more than just motorized vehicles, future traffic congestion is expected to increase due to space constraints that limit roadway and intersection expansions. Furthermore, since infill development in the downtown area is highly desired, a higher level of traffic congestion will be considered acceptable.

The Traffic Study included with the Initial Study in Appendix A2 concluded that of the 23 intersections analyzed, all but seven intersections currently operate a satisfactory level, with or without the project. This means that the addition of the Project alone does not have a significant impact on traffic delays beyond the existing conditions or beyond an acceptable Level of Service required by the General Plan. The seven intersections projected to operate at a deficient LOS are:

- 12th Avenue/Flint Avenue (a.m. peak hour only)
- 12th Avenue/Fargo Avenue (a.m. and p.m. peak hours)
- Fitzgerald Lane/Fargo Avenue (a.m. peak hour only)
- Glacier Way/Fargo Avenue (a.m. and p.m. peak hours)
- 11th Avenue/Flint Avenue (a.m. peak hour only)
- 12th Avenue/Project Driveway 1 (a.m. peak hour only)
- Project Driveway 4/Fargo Avenue (a.m. and p.m. peak hours)

Further, the Traffic Study concluded that the cumulative year (2042) plus project conditions, that of the 23 intersections analyzed, all but eight intersections currently operate a satisfactory level, meaning that when accounting for both overall regional growth and the impact of the Project, most intersections are anticipated to operated at a satisfactory level. The eight intersections projected to operate at a deficient LOS are all seven listed above with the addition of the following:

- 12th Avenue/Liberty Street – Kings County Drive (a.m. peak hour only)

The Traffic Study found that with the proposed roadway improvements included within the Traffic Study and summarized in Table 4-6 below, all 23 study intersections would operate at a satisfactory level. The Project includes on- and off-site roadway upgrades to support circulation around the site and within Hanford. Although the May 2023 study by LSA Associates identifies potential capacity improvements, traffic delays and LOS no longer determine CEQA compliance. However, the improvements in Table 4-5 have been identified as mitigation measures in Section 4.8.5 below. Therefore, through compliance with all applicable the programs, plans, ordinances, or policies addressing the circulation system and the implementation of **Mitigation Measures T-17 through T-20**, the Project is expected to operate at an acceptable LOS under LOS standards and reduce impacts to a less than significant level.

Table 4-5. Intersection Improvements for Proposed Project

Intersection	Funding Mechanism	Project Responsibility
12th Avenue/Fargo Avenue	Project Responsibility/Fair Share	Optimize signal timings
Fitzgerald Lane/Fargo Avenue	Project Responsibility	Install two-way left turn lane (TWLTL) median with provision of merging lane for

		northbound left turn (NBL) traffic from Fitzgerald Lane
12th Avenue/Project Driveway 1	Project Responsibility	Install traffic signal
Project Driveway 4/Fargo Avenue	Project Responsibility	Install traffic signal

Source: Traffic Study prepared by LSA Associates, Inc. in May 2023

County of Kings General Plan Circulation Element

The Project would be consistent with the applicable goals and policies of the County's General Plan Circulation Element. As discussed in Section 3, Project Description, the Project site is within the jurisidiction of the City of Hanford and is aligned with the land use designated by the City's General Plan. Since the City is serving as the lead agency, a thorough consistency analysis with the Kings County General Plan is not provided, However, since some of the roadways on and near the Project site fall within Kings County, the consistency with the County's Circulation Element was reviewed. Specifically, the Project is consistent with the County's goal to provide a coordinated circulation system with a variety of safe and efficient transportation alternatives and modes that interconnect cities and community districts that meets the growing needs of residents, visitors and businesses.

Based on the analysis provided above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and its impact to the transportation plans and programs would be *less than significant.*

Threshold B: Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Significant and Unavoidable (Class I): The project would result in VMT above the adopted thresholds that cannot be reduced to a less than significant threshold with mitigation incorporated.

Based on the City of Hanford's VMT Guidelines, all Projects must limit the generation of VMT to 13% or more below the regional VMT average. A Project that does not meet these requirements will have a significant impact. The VMT per capita of the Project was calculated for the existing year (2023) using the estimates from the KGAG model. While the Project would be built over time, the Year 2025 analysis shows how the VMT generated by the proposed Project compares to current travel and VMT characteristics in Kings County. Table 4-6 presents the VMT per capita of the TAZ where the Project is located compared to the regional average (represented as the Kings County Baseline VMT in Table 4-6).

Table 4-6. Proposed Project VMT Analysis

VMT Metrics for Housing Project	***VMT Per Capita***
Project TAZ VMT Estimate (2023)	9.36
Threshold *(13% Below Regional Baseline)*	8.99
Project Level over Threshold	+14.2%
VMT Impact?	YES

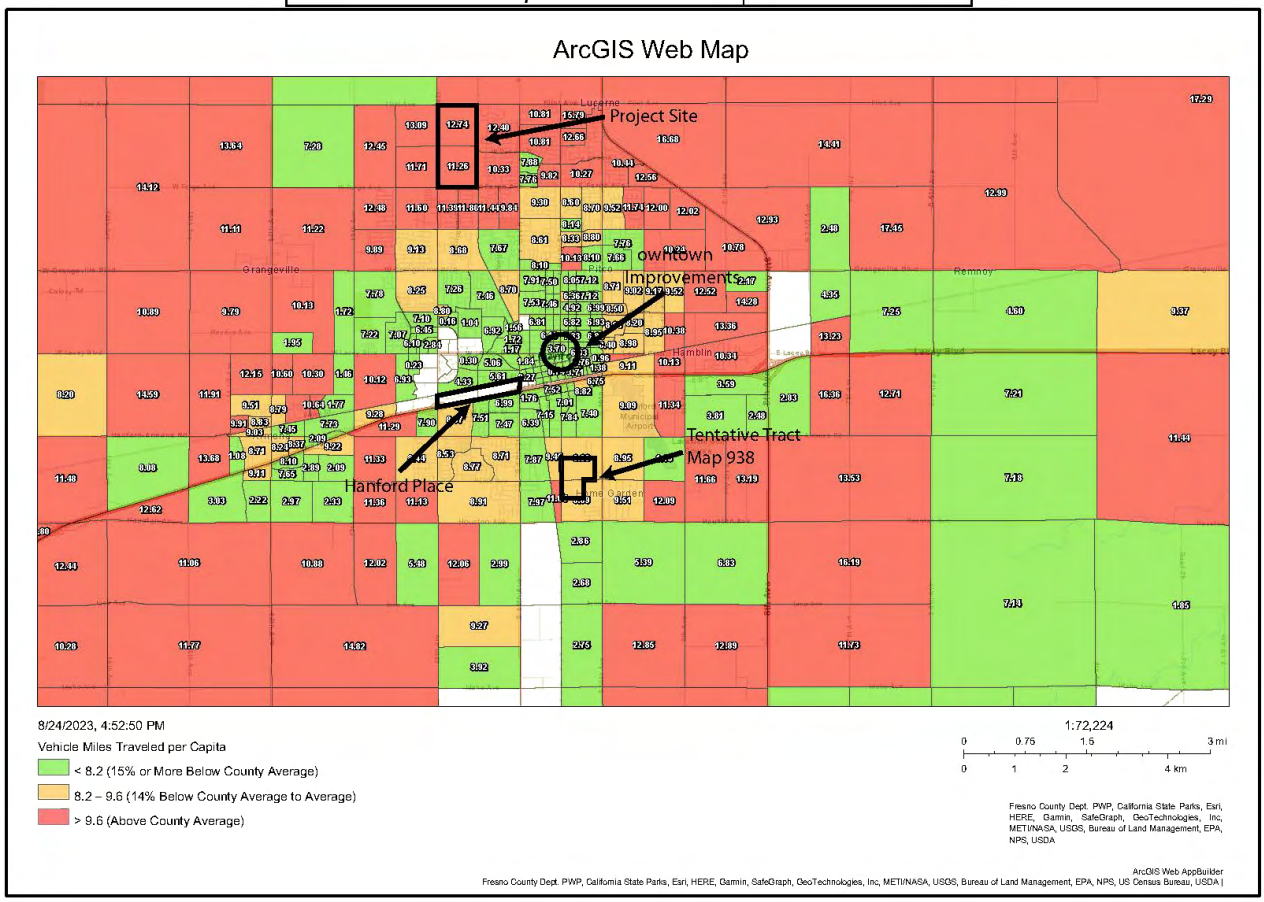

Figure 4-2. TAZ Zones with Project and Proposed Project Locations

Source: *VMT Online Mapping Tool*

As shown in Table 4-7, the proposed Project's TAZ is estimated to generate 10.27 VMT Per Capita. In comparison to the threshold established (13% below the regional baseline VMT) the proposed Project's TAZ is 14.2% over the threshold. Although the Project VMT estimate is 9.3% below the VMT per capita for the entire County, the Project must be at least 13% below the County baseline in order to have a less than significant VMT impact. Due to the size of the proposed Project and no inclusion of affordable housing units, the Project is estimated to generate more daily trips.

In order to mitigate the Project's VMT impacts to less than significant, the VMT per capita would need to be reduced by 14.2%.Current mitigation guidance provided by CAPCOA states the maximum possible reduction in VMT is 15% in suburban locations (*Quantifying Greenhouse Gas Mitigation Measures CAPCOA, 2010, Page 61*) According to this document, the Project is in a suburban location. This document defines locations as either Urban, Compact Infill, Suburban Center, Suburban, or Rural. The definition of suburban matches this location, as shown below in Table 4-7. For this Project's mitigation measures, it will be classified as suburban.

Table 4-7. Definition of Suburban Area Compared to the Project

	CAPCOA Suburb Definition. "Suburbs typically have the following characteristics: "	**Fargo Village Project/Site**
Location relative to the regional core:	These locations are typically 20 miles or more from a regional CBD	30 miles from Downtown Fresno
Ratio or relationship between jobs and housing:	Jobs Poor	Hanford has 15,395 Employees in the Community, and a Work Force of 21,225 (2020 U.S. Census), for a Net Job Outflow of -5830 Jobs
Typical building heights in stories:	One to two stories	Single-story and two-story buildings proposed
Typical street pattern:	Curvilinear (cul-de-sac based)	Curvilinear *(this Project and the surrounding developments actually exhibit more of a curvilinear loop pattern so I wouldn't call it "cul-de-sac based", but it's still classified as curvilinear)*
Typical setbacks:	Parking is generally placed between the street and office or retail buildings;	N/A for the proposed Project. True of commercial/office uses within 1 mile.
	Large-lot residential is common	Typical suburban single-family lot sizes proposed
Parking supply	Ample, largely surface lot-based	Ample on-street parking provided
Parking prices	None	None proposed & paid parking not typical within 1 mile of the Project site

Source: Quantifying Greenhouse Gas Mitigation Measures, CAPCOA, 2010, Page 60

The City adopted the City of Hanford VMT Thresholds and Implementation Guidelines (VMT Guidelines) in November 2022. As a result, the project's VMT analysis (prepared and updated by LSA Associates and attached with the Intitial Study as Appendix A2) followed the methodology and significance thresholds outlined in these guidelines. As previously noted, the project consists of residential, educational (elementary school), and retail/commercial land uses. According to the guidelines, mixed-use projects must be evaluated separately for each component. Therefore, each part of the project was analyzed individually.

The City's VMT Guidelines include screening criteria for small land use projects or project components to be screened out, meaning further and detailed VMT analyais is not requried. These screening criteria include:

- Tranist Priority Areas. Since the project is not located within 0.5 miles of a tranist priority area, this screeening criteria does not apply.
- Local-serving retail. According to the VMT Guidelines, retail projects with a total area of less than 55,000 square feet may be considered local-serving and exempt from a detailed VMT analysis. The project's retail component is approximately 49,000 square feet, falling below the 55,000 square-foot threshold. Therefore, the commerical/retail component of the project meets this criteria therefore a detailed VMT analysis is not required.
- Redevlopment Projects. Since the project site is currently vacant and doesn not proposed the redevelopment of a site
- Affordable Housing Projects. The project proposed market rate housing and therefore does not meet the criteria to screen out as an afforadable housing project.
- Average Daily Trip Threshold. The City's VMT Guidelines allow for projects that are consistent with the General Plan and do not generate over 500 Average Daily Trips (ADT) to be screened out. The project is anticpated to generate 15,282 daily trips, and therefore does not meet the criteria to screen out.
- Instituational/Government and Public Services Project: Since the project does not propose institutiuonal or government uses, this screening critieria does not apply.
- Specific Land Use Screning. According to the VMT Guidelines, local parks, daycare centers, student housing, local-serving gas stations, banks, and K-12 Public schools screen out from requiring additional VMT analysis. The propject inludes both a 14.99-acre school site and 12.35 acres of parkland. Therefore, the park and school components of the project meets this critiers and a detailed VMT analysis is not requied.
- Low VMT Areas. Since the project site is vacant, the traffic analysis zones (TAZs) has insufficient data regarding households or employment therefore it can not be confimed if it is a low VMT Area using the Kings County Association of Goverments traffic demand model. Therefore, this screening criteria does not apply.

As summarized above, the retail, park and school components of the project meet the screening criteria and do not require further VMT analysis. However, the residential component does not qualify for any of the screening exemptions outlined in the guidelines. As a result, a

detailed VMT analysis was conducted to assess its impact. LSA Associates prepared the VMT Analysis attached with the Initial Study as Appendix A2.

Residential Projects are only able to decrease VMT with certain methods, primarily by increasing transit use or providing more employment opportunities and complementary land uses near the residences. These methods are difficult to achieve in suburban areas (as classified in Table 4-7) as compared to dense urban areas

Travel models estimate VMT based on regional and project-specific trip patterns but have limited ability to account for project design features or internal circulation in mixed-use projects or specific plans. Design elements such as site layout, internal street connectivity, proximity to complementary land uses, and access to transit and active transportation options can further reduce VMT by decreasing vehicle dependency and promoting alternative transportation. To reflect these benefits, the project's VMT estimate was adjusted to incorporate relevant design features provided by the applicant.

The City's VMT Guidelines outline feasible mitigation measures and project design features, many of which come from the CAPCOA Green Book (December 2021). This resource identifies evidence-based strategies for reducing VMT, categorizing their applicability for urban, suburban, and rural areas. Since Hanford is the largest urban center in Kings County, VMT reduction strategies suited to urban/suburban settings were reviewed to determine their relevance to this project.

The CAPCOA Green Book also provides methods for estimating VMT reductions for each measure. These methodologies were adapted to Hanford's local conditions where applicable data was available, ensuring that any reductions were based on appropriate city-specific factors.

VMT reductions should be assessed using state-of-the-practice methodologies, recognizing that the effectiveness of many mitigation strategies and design features depends on long-term resident behavior. As previously noted, estimated VMT reductions from project design features are based on Table F of the City's VMT Guidelines, which was developed using the CAPCOA Green Book. The project features include:

- Provide Electirc Vehicle (EV) Parking and Charging Infrastrutuce.
  Proviving additional EV parking and charging stations may promiote overall EV use and help to reduce greenhouse gas emissions. As such, the CALGreen mandates new developments to include EV charging infrastruture which require multi-family residnetial projects to have five percent of parking spaces with EV charges and 35 percent of spaces be EV-capable and ready. Based on CAPCOA guidelines, adding 11 additional (beyond what CALGreen requires) EV chargers could reduce the VMT for multifamily by 11.9%, which could reduce the overall project VMT by 1.2%. Although EV chargers may help lower GHG emissions, their direct impact on VMT reduction is

uncertain and this is considered an infeasible mitigation measure and therefore no VMT reduction was assumed for this project design feature as a conservative approach.

- Pedestrain and Bike Infrastructure.
  The project includes sidewalks and pedestrian improvements both within the development and along the project frontage. A 10-foot-wide bike/pedestrian trail will loop around the site, connecting key destinations like retail, schools, and parks. This trailway will integrate with external pedestrain and bike networks, ultimately providing better access to the surrounging areas which may reduce reliance on vehicle trips, particulary for short term commutes. However, since Improving Street Connectivity already captures pedestrain and bike facilities, no additional VMT reduction can be credited based on this design feature; therefore this is an infeasible mitigation measure.
- Traffic Calming.
  Traffic calming measures may encourage alternative modes of transportation such as walsking and biking. Traffic calming measures include marked sidewalks, raised intersections, median islands, tight corner radii, roundabouts, count-down signal timers, curb extensions, speed tables, raised crosswalks, on-street parking, planter strips with street trees, and chicanes/chokers. The project proposes these design features deve,op a safe and integrated active transportation networks that may reduce VMT. These measures are also included in CAPCAO Guidelines with a potential decrease in VMT of up to one persent. While implementation of this measure may potentially help in some reduction in project VMT, due to lack of substantial evidence no VMT reduction has been attributed to this project design feature as it is considered an infeasible mitigation.

As summarized above, the project's design features are intended to enhance mobility while aiming to reduce VMT and greenhouse gas emissions. However, due to uncertainty regarding their effectiveness, a conservative approach was taken, and no official VMT reduction was assumed for the design features. Therefore, the Project will have a *significant and unavoidable* VMT impact (Class I).

Threshold C: 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 (Class III) The Project does not propose any incompatible uses or include any design features that could increase traffic hazards. The Project includes new vehicle access points via Fargo Avenue, Flint Avenue, and 12th Avenue. These improvements will be subject to review by the City's engineer, as the new access point may pose a safety risk due to the Project design. The proposed Project would not substantially increase hazards in or around the Project area with incorporation of conditions from the Engineering Division and compliance with City standards. The impact is *less than significant.*

Threshold D: Would the Project result in inadequate emergency access?

No Impact (Class III). This Project would not result in inadequate emergency access. Emergency access to the site would be via Fargo Avenue, Flint Avenue, and 12th Avenue. A network of local roads within the proposed Project property provides full access to all buildings within the development. The Project would have *no impact* on emergency access.

4.8.5 Mitigation Measures

Mitigation Measure T-17: The Project Proponent is responsible for pay the fair share proportion (76.48%) of the intersection improvements for adding a northbound right lane at 12th Avenue and Fargo Avenue.

Mitigation Measure T-18: The Project Proponent shall be required to improve the intersection of Fitzgerald Lane and Fargo Avenue by installing two-way left turn lane (TWLTL) median with provision of merging lane for northbound left turn (NBL) traffic from Fitzgerald Lane by project buildout.

Mitigation Measure T-19: The Project Proponent shall be required to improve the intersection of 12th Avenue and Project Driveway 1 by paying their fair share contribution installing a traffic signal by project buildout.

Mitigation Measure T-20: The Project Proponent shall be required to improve the intersection of Project Driveway 4 and Fargo Avenue by installing a traffic signal by project buildout.

4.8.6 Level of Significance After Mitigation

Threshold A: Less than significant with mitigation incorporated. As descirbed in the analysis in Section 4.8.4 above, with the inciorpoation of Mitigation Measures T-17 through T-20, the project would operated at a satisfactory level of service, and therefore be in compliance with the General Plan.

Threshold B. Significant and Unavoidable. Given the qualitative nature of the project design features, the uncertainty of the quantitative effectiveness of these features, and a lack of localized substantial evidence of the VMT reduction mitigation measures, no VMT reduction was assumed in the modeling performed by LSA Associates. Therefore, as stated in the analysis in Section 4.8.4 above, even with the project design features incorporated, there are no additional feasible mitigation measures that can be applied to reduce VMT to a less than significant level.

Threshold C. Less than significant. As descirbed in the analysis in Section 4.8.4 above, the project does not propose any incompatible land uses or traffic hazards. No additional mitigation measures are required.

Threshold D. No Impact. As described in the analysis in Section 4.8.4 above, the project does pose any kind of threat to emergency access. No additional mitigation measures are required.

4.9 Air Quality

This section describes the existing air quality conditions of the Project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed Project. This section assesses potential effects on air quality that could result from implementation of the proposed Project. The analysis in this section is based on the Air Quality and Greenhouse Gas Assessment that was prepared by 4Creeks, Inc. in August 2024 which can be found in Appendix B of this EIR.

4.9.1 Environmental Setting

San Joaquin Valley Air Basin

The Project lies in western Kings County, within the San Joaquin Valley Air Basin. The San Joaquin Valley Air Basin is bordered by the Sierra Nevada Mountains to the east, Coastal Ranges to the west, and the Tehachapi Mountains to the south. These mountain ranges restrict air movement and prevent the dispersal of pollution in the Valley below.

The San Joaquin Valley Air Pollution Control District is comprised of the San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, and Tulare Counties and the Valley portion of Kern County and has jurisdiction over most air quality matters in the San Joaquin Valley Air Basin (SJVAB). Due to topographic features and the prevalence of agriculture in the region, the San Joaquin Valley Air Basin (SJVAPCD) has one of the most severe air pollution problems in the State of California and the nation. Air pollution is hazardous to health, reduces visibility, degrades or soils materials, and can damage native vegetation. State and national ambient air quality standards were created to protect health and welfare, and to minimize other impacts. The ambient air quality standards are outlined in the Regulatory Setting section.

The SJVAPCD has developed a Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI) to act as an advisory document for addressing air quality in environmental documents. The GAMAQI was used as a guide for addressing air quality impacts in this report.

Air Pollutants of Concern

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards for outdoor concentrations. The federal and state standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons such as children, pregnant women, and the elderly, from illness or discomfort. Criteria air pollutants include ozone (O3), nitrogen dioxide (NO2), carbon monoxide (CO), sulfur dioxide (SO2), particulate matter 2.5 microns or less in diameter (PM2.5), particulate matter ten

microns or less in diameter (PM10), and lead (Pb). Note that reactive organic gases (ROGs), which are also known as reactive organic compounds (ROCs) or volatile organic compounds (VOCs), and nitrogen oxide (NOx) are not classified as criteria pollutants. However, ROGs and NOx are widely emitted from land development Projects and participate in photochemical reactions in the atmosphere to form O3; therefore, NOx and ROGs are relevant to the proposed Project and are of concern in the air basin and are listed below along with the criteria pollutants. As shown in Table 4-9, the SJVAB is in nonattainment for several pollutant standards.

Ozone: Ozone is not emitted directly into the environment but is generated from complex chemical reactions between reactive organic gases (ROG), or non-methane hydrocarbons, and oxides of nitrogen (NOX) that occur in the presence of sunlight. ROG and NOX generators in Kings County include motor vehicles, recreational boats, other transportation sources, and industrial processes.

PM10: PM10, or particulate matter, is a complex mixture of primary or directly emitted particles, and secondary particles or aerosol droplets formed in the atmosphere by precursor chemicals.

Carbon Monoxide: Carbon Monoxide (CO) is a colorless, odorless, and poisonous gas produced by incomplete burning of carbon in fuels. When CO enters the bloodstream, it reduces the delivery of oxygen to the body's organs and tissues. Health threats are most serious for those who suffer from cardiovascular disease, particularly those with angina or peripheral vascular disease. Exposure to elevated CO levels can cause impairment of visual perception, manual dexterity, learning ability and performance of complex tasks. The primary source of carbon monoxide is automobile use.

Nitrogen Dioxide: Nitrogen Dioxide (NO2) is a brownish, highly reactive gas that is present in all urban atmospheres. NO2 can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections. Nitrogen oxides are an important precursor both to ozone (O3) and acid rain and may affect both terrestrial and aquatic ecosystems.

The major mechanism for the formation of NO2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide (NO). NO2 plays a key role, together with VOCs, in the atmospheric reactions that produce O3. NO2 forms when fuel is burned at hot temperatures. The two major emission sources are transportation and stationary fuel combustion sources such as electric utility and industrial boilers.

Sulfur Dioxide: Sulfur Dioxide (SO2) affects breathing and may aggravate existing respiratory and cardiovascular disease in high doses. Sensitive populations include asthmatics, individuals with bronchitis or emphysema, children, and the elderly. SO2 is also a primary contributor to acid deposition, or acid rain, which causes acidification of lakes and streams and can damage trees, crops, historic buildings, and statues. In addition, sulfur compounds in the air contribute to visibility impairment in large parts of the country. This is especially

noticeable in national parks. Ambient SO2 results largely from stationary sources such as coal and oil combustion, steel mills, refineries, pulp, and paper mills and from nonferrous smelters.

Table 4-8. San Joaquin Valley Attainment Status

Pollutant	Designation/Classification	
	Federal Standards	**State Standards**
Ozone – One hour	No Federal Standard[f]	Nonattainment/Severe
Ozone – Eight hour	Nonattainment/Extreme[e]	Nonattainment
PM 10	Attainment[c]	Nonattainment
PM 2.5	Nonattainment[d]	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

[a] See 40 CFR Part 81
[b] See CCR Title 17 Sections 60200-60210
[c] On September 25, 2008, EPA redesignated the San Joaquin Valley to attainment for the PM10 National Ambient Air Quality Standard (NAAQS) and approved the PM10 Maintenance Plan.
[d] The Valley is designated nonattainment for the 1997 PM2.5 NAAQS. EPA designated the Valley as nonattainment for the 2006 PM2.5 NAAQS on November 13, 2009 (effective December 14, 2009).
[e] 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).
[f] 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

Ambient Air Quality

Ambient air quality in Hanford can be inferred from ambient air quality measurements conducted at nearby air quality monitoring stations. Existing levels of ambient air quality and historical trends and Projections in the vicinity of Hanford are documented by measurements made by the SJVAPCD, which also maintains air quality monitoring stations that process ambient air quality measurements.

The purpose of the monitoring station is to measure ambient concentrations of pollutants and determine whether ambient air quality meets the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). Ozone and particulate matter (PM10 and PM2.5) are pollutants of particular concern in the SJVAB. The monitoring station located closest to the proposed Project site and most representative of air quality near the proposed Project site is Hanford-Irwin station, located at 807 South Irwin Street in Hanford, which is approximately 3.5 miles southeast of the Project site. Ambient emission concentrations vary due to localized variations in emissions sources and climate and should be considered "generally" representative of ambient concentrations near the Project site. Air monitoring data was retrieved from both the Hanford-Irwin location and the Corcoran-Patterson stations, which is about 19.2 miles south of the site, to provide data from the years 2021 to 2023. Both air monitoring stations in Kings County monitor ozone, PM 2.5, and PM 10, but the Hanford-Irwin location also monitors nitrogen dioxide. However, the Corcoran-Patterson station was required to find the number of days that PM 10 levels were above the national 24-hour standard in 2021 as the other location did not have any data available. Refer to Table 4-9, Hanford-Irwin and Corcoran-Patterson Ave Air Monitoring Station Data for more information.

Table 4-9. Hanford-Irwin & Corcoran-Patterson Air Monitoring Station Data

Pollutant	Averaging Time	Item	Standard	2021	2022	2023
Ozone	1 Hour	Max 1 Hour (ppm)	0.09 ppm	0.102	0.091	0.091
		Days > State Standard (0.09 ppm)	--	2	0	0
	8 Hour	Max 8 Hour (ppm)	0.070 ppm	0.096	0.082	0.084
		Days > State Standard (0.070 ppm)	--	18	13	14
		Days > National Standard (0.070 ppm)	--	16	12	11
		Days > National Standard (0.075 ppm)	--	4	3	5
PM 2.5	24-Hour	Max 24 Hour Average Concentration ($\mu g/m^3$)	--	81	62.9	54.4
		Days > National 24-Hour Standard	--	31.6	27	11
	Annual	Annual average Concentration ($\mu g/m^3$)	12 $\mu g/m^3$	16.6	16.1	13.5
PM 10	24-Hour	Max 24 Hour Average Concentration ($\mu g/m^3$)	50 $\mu g/m^3$	192.7	251.6	159.3
		Days > State 24-Hour Standard	--	151.7	143	116.5
		Days > National 24-Hour Standard	--	10.2	1	1
	Annual	Annual Average Concentration ($\mu g/m^3$)	20 $\mu g/m^3$	52.8	49.9	44.2

Source: California Air Resources Board Air Quality Statistics – iADAM tool

California and National Air Quality Standards has been included in Table 4-11 below, California and National Ambient Air Quality Standards.

Table 4-10. California and National Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	National Standards	
		Concentration[3]	Primary	Secondary
Ozone (03)	1 Hour	0.09 ppm (180 μg/m^3)	--	Same as Primary Standard
	8 Hour	0.070 ppm (137 μg/m^3)	0.075 ppm (147 μg/m^3)	
Respirable Particulate Matter (PM_{10})	24 Hour	50 μg/m	150 μg/m^3	Same as Primary Standard
	Annual Arithmetic Mean	20 μg/m3	--	
Fine Particulate Matter ($PM_{2.5}$)	24 Hour	--	35 μg/m^3	Same as Primary Standard
	Annual Arithmetic Mean	12 μg/m^3	15 μg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	--
	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	--
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)	--	--
Nitrogen Dioxide (NO_2) [8]	1 Hour	0.18 ppm (339 μg/m^3)	100 ppb (188 μg/m^3)	--
	Arithmetic Mean	0.030 ppm (57 μg/m^3)	53 ppb (100 μg/m^3)	Same as Primary Standard
Sulfur Dioxide	1 Hour	0.25 ppm (655 μg/m^3)	75 ppb (196 μg/m^3)	--
	3 Hour	--	--	0.5 ppm (1300 μg/m^3)
	24 Hour	0.04 ppm (105 μg/m^3)	0.14 ppm (for certain areas)	--
	Annual Arithmetic Mean	--	0.030 ppm (for certain areas)	--
Lead[10,11]	30 Day Average	1.5 μg/m^3	--	--
	Calendar Quarter	--	1.5 μg/m3 (for certain areas)	Same as Primary Standard
	Rolling 3-Month Average	--	0.15 μg/m^3	
Visibility Reducing Particles[12]	8 Hour	See Footnote 1	No National Standards	
Sulfates	24 Hour	25 μg/m^3		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 μg/m^3)		
Vinyl Chloride[10]	24 Hour	0.01 ppm (26 μg/m^3)		

Source: SJVAPCD

Notes: 1 In 1989, the California Air Resources Board (CARB) 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. Key: μg/m3 = micrograms per cubic meter; mg/m3 = milligrams per cubic meter; ppm = parts per million Source: CARB 2016c

Toxic Air Contaminants

In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. TACs are considered either carcinogenic or noncarcinogenic based on the nature of the health effects associated with exposure to the pollutant. For regulatory purposes, carcinogenic TACs are assumed to have no safe threshold below which health impacts would not occur, and cancer risk is expressed as excess cancer cases per one million exposed individuals. Noncarcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

There are many different types of TACs, with varying degrees of toxicity. Sources of TACs include industrial processes, such as petroleum refining and chrome-plating operations; commercial operations, such as gasoline stations and dry cleaners; and motor vehicle exhaust. Public exposure to TACs can result from emissions from normal operations, as well as from accidental releases of hazardous materials during upset conditions. The health effects associated with TACs are quite diverse and generally are assessed locally, rather than regionally. TACs can cause long-term health effects such as cancer, birth defects, neurological damage, asthma, bronchitis, or genetic damage, or short-term acute affects such as eye watering, respiratory irritation (a cough), running nose, throat pain, and headaches.

To date, CARB has designated 244 compounds as TACs. Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. The majority of the estimated health risks from TACs can be attributed to a relatively few compounds. CARB identified diesel particulate matter (DPM) as a TAC. DPM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances. Diesel exhaust is a complex mixture of particulates and gases produced when an engine burns diesel fuel. DPM is a concern because it causes lung cancer; many compounds found in diesel exhaust are carcinogenic. DPM includes the particle phase constituents in diesel exhaust. The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, lightheadedness, and nausea. DPM poses the greatest health risk among the TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiovascular diseases. Residential areas are considered sensitive receptors to air pollutions because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Children are considered more susceptible to health effects of air pollution due to their immature immune systems and developing organs. As such, schools are also considered sensitive receptors, as children are present for extended durations and engage in regular outdoor activities. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation.

4.9.2 Regulatory Setting

Regional Attainment Status

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 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_{10} standard on September 21, 2006, when a new $PM_{2.5}$ 24-hour standard was established.

The California Environmental Quality Act (CEQA) requires lead agencies to determine if each Project of a certain threshold has an impact on the air quality of the area. The Air Quality standards and Greenhouse Gas guidance measures are used to establish levels of air quality impact of a Project. The following regulatory background represents global, federal, state, and local standards and guidance that have been reviewed in this study.

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.

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, the 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.

San Joaquin Valley Air Pollution Control District (SJVAPCD): The SJVAPCD is responsible for enforcing air quality standards in the Project area. The following SJVAPCD rules and regulations may apply to the proposed Project:

- **Rule 2010:** Permits Required. The purpose of this rule is to require any person constructing, altering, replacing, or operating any source operation which emits, may emit, or may reduce emissions to obtain an Authority to Construct or a Permit to Operate. This rule also explains the posting requirements for a Permit to Operate and the illegality of a person willfully altering, defacing, forging, counterfeiting, or falsifying any Permit to Operate.
- **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 4002:** National Emission Standards for Hazardous Air Pollutants. This rule incorporates the National Emission Standards for Hazardous Air Pollutants from Part 61, Chapter I, Subchapter C, Title 40, Code of Federal Regulations (CFR) and the National Emission Standards for Hazardous Air Pollutants for Source Categories from Part 63, Chapter I, Subchapter C, Title 40, Code of Federal Regulations (CFR).
- **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 4102:** Nuisance. The purpose of this rule is to protect the health and safety of the public.
- **Rule 4601:** Architectural Coatings. The purpose of this rule is to limit VOC emissions from architectural coatings. This rule specifies architectural coatings storage, cleanup, and labeling requirements.
- **Rule 4641:** Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations. The purpose of this rule is to limit VOC emissions from asphalt paving and maintenance operations. This rule applies to the manufacture and use of cutback asphalt, slow cure asphalt and emulsified asphalt for paving and maintenance operations.

- **Rule 4662:** District Rule 4662 was developed to help reduce emissions of volatile organic compounds (VOC) and hazardous air pollutants produced from degreasing operations, in which an enclosure or device is used for removing dirt, oil, grease and other contaminants.
- **Rule 4663:** District Rule 4663 was developed to limit the emissions of volatile organic compounds (VOCs) from organic solvent cleaning and from the storage and disposal of solvents and waste solvent materials.
- **Rule 9510:** Indirect Source Review (ISR). This rule reduces the impact PM10 and NOX 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. This Project will submit an Air Impact Assessment (AIA) application in accordance with Rule 9510's requirements.
- **Regulation VIII:** Fugitive PM10 Prohibitions. Regulation VIII is composed of eight rules which together aim to limit PM10 emissions by reducing fugitive dust. These rules contain required management practices to limit PM10 emissions during construction, demolition, excavation, extraction, and/or other earth moving activities.

Ambient Air Quality Analysis (AAQA)

As stated above, the SJVAPCD oversees air quality policy in the region, following the Guidance for Assessing and Mitigation Air Quality Impacts (GAMAQI). The key air quality standard within GAMAQI include the National Ambient Air Quality Standards (NAAQS) set by the EPA and the California Ambient Air Quality Standards (CAAQS) set by CARB., which is often more strict than its federal counterpart NAAQS. Both NAAQSI and CAAQS regulate 03, PM, CO, Nox, Sox, and lead; while CARB (CAAQS) also monitors hydrogen sulfide and vinyl chloride.

Air basins are categorized based on air quality standards and areas that exceed limits and thresholds are labeled non-attainment and further classified as marginal, moderate, serious, severe, or extreme. The State of California is required to submit plans to the EPA outlined how it intends on meeting the NAAQS. The SJVAPCD develop the local strategies which are incorporated into these plans.

Projects are considered to have a significant impact on the air quality and environment if emissions exceed 100 ponds per day (lbs/day) of any regulated pollutant, even after mitigation efforts. In such cases, an AAQA is performed to predict whether emissions will violate air quality standards.

4.9.3 Thresholds and Methodology

The impact analysis provided in Chapter 4.9.4 is based on the application of the following California Environmental Quality Act (CEQA) Guidelines Appendix G, which indicates that a project would have a significant impact on air quality if it would:

1. *Conflict with or obstruct implementation of any applicable air quality plan.*
2. *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.*
3. *Expose sensitive receptors to substantial pollutant concentrations.*
4. *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.*

The significance criteria established by the applicable air quality management or air pollution control district (SJVAPCD) may be relied upon to make the above determinations. According to the SJVAPCD, an air quality impact is considered significant if the proposed Project would violate any ambient air quality thresholds, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SJVAPCD has established thresholds of significance for air quality for construction and operational activities of land use development projects, which is shown in Table 4-11 – SJVAPCD Thresholds of Significance for Criteria Pollutants.

Table 4-11. Thresholds of Significance for Criteria Pollutants

Pollutant/Precursor	Construction Emissions	Operational Emissions	
		Permitted Equipment and Activities	Non-Permitted Equipment and Activities
	Emissions (tpy)	Emissions (tpy)	Emissions (tpy)
CO	100	100	100
NOx	10	10	10
ROG	10	10	10
SOx	27	27	27
PM10	15	15	15
PM2.5	15	15	15

Source: SJVAPCD

CO Hotspot Analysis

In addition to the daily thresholds listed above, the proposed Project area would also be subject to the ambient air Quality standards, through an analysis of localized CO impacts. The California 1-hour and 8-hour CO standards are:

- 1-hour = 20 parts per million (ppm)
- 8-hour = 9 parts per million (ppm)

The significance of localized impacts depends on whether ambient CO levels in the vicinity of the Project site are above state and federal CO standards. Carbon monoxide concentrations

in the San Joaquin Air Basin currently meets the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for carbon monoxide (CO).

Methodology

Air pollution emissions can be estimated by using emission factors and examining the level of activity occurring. Emission factors are the emission rate of a pollutant given the activity over time; for example, grams of NOx per horsepower hour. The ARB has published emission factors for on-road equipment and vehicles in the OFFROAD emission model. An air emissions model (or calculator) combines the emission factors and the various levels of activity and outputs the emissions for the various pieces of equipment.

The potential impacts to air quality have been fully analyzed in the Air Quality and Greenhouse Gas Assessment prepared by 4Creeks in August 2024, which can be found in Appendix B, of this EIR. The California Emissions Estimator (CalEEMod), Version 2020.4.0, is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutants and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use Projects. The model quantifies direct emissions from construction and operations, including vehicle use, as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. The model incorporates Pavley standards and Low Carbon Fuel standards into the mobile source emission factors. Further, the model identifies mitigation measures to reduce criteria pollutant and GHG emissions along with calculating the benefits achieved from measures chosen by the user.

The residential portion was separated into three separate land use classes based on density. The low-density residential (R-L-5) portion will consist of (126) 11,900 square foot lots, (185) 7,200 square foot lots, and (399) 5,000 square foot lots. The medium density residential (R-M) portion will consist of 216 small-lot homes (4,000 square feet). The Neighborhood Commercial portion will contain 45,000 square feet of commercial development and include a minimum of 129 parking spaces according to the parking requirements for the “Integrated Shopping Center” category outlined in the Hanford Municipal Code (§17.54.040), which specifies 1 parking spot per 350 square feet of commercial building space. The commercial square footage was based on the conceptual plan provided in the Project’s site plan (see Figure 3-7 and 3-8).
CalEEMod default values were used to estimate construction duration, construction trips, equipment use, trip lengths, landscaping area, construction equipment emission factors, paved area, energy use, water use, vehicle emission factors and solid waste generation.

The user-entered non-default categories included the land use, modified demolition timeline, operational hearths, operational fleet mix, engine tiers for the construction equipment, architectural coatings, and several CalEEMod reduction measures in order to accurately depict the Project’s features. The land use modifications included specific building square footage,

which was based on the lot sizes and the lot coverage determined in the Fargo Village Design Guidelines (2024). As mentioned previously, the commercial portion was from the Project site plan. The city park included the stormwater retention basin in addition to the 12.35-acre park. The construction timeline was slightly altered because the demolition phase will likely not last more than two days, as the structure to be demolished is 650 square feet. Additionally, there would be no wood stoves in the development, and no fireplaces were assumed for the apartment and small-lot homes. For the operational fleet mix, the District Accepted Fleet Mix from the SJVAPCD was used in place of the residential fleet mix (2013). Construction off-road equipment was also adjusted to account for Mitigation Measure HRA-1, which requires the implementation of Tier—4 Engine Controls. Lastly, the architectural coatings were altered in the Construction screen to account for Rule 4601, which requires reduced VOC for various types of exterior and interior architectural coatings.

4.9.4 Project Impacts

Threshold A: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Significant and Unavoidable (Class I): The Project is anticipated to exceed SJVAPCD thresholds of significance, even with implementation of Mitigation Measures AQ-1 and HRA-1. Therefore, the Project will conflict with or delay the implementation of the SJVAPCD attainment plan.

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 Tables 4-13 and 4-14 for construction and operation.

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.

Short-Term Emissions

Project construction would generate pollutant emissions from the following construction activities: site preparation, grading, building construction, application of architectural coatings, and paving. The short-term emissions from these activities were calculated using CalEEMod

Version 2022.1.1. The full CalEEMod Report can be found with the Initial Study attached as Appendix A2. As shown in Table 4-13 below, Project construction related emissions do not exceed the thresholds for criteria pollutants established by the SJVAPCD.

Construction Phase Modeling Parameters

Lot sizes, commercial square footage, and parking space counts were based on the approved site plan for the Project and the standards set forth in the City of Hanford Municipal Code. Architectural coatings were set to follow Rule 4601, which limits the VOC emissions from architectural coatings. For construction this value was set to the established limit for the SJVAPCD, which is 50 g/L for each product. Default values provided in CalEEMod were used where detailed Project information was not available. The construction phases for the residential, park and school portion included demolition, site preparation, grading, building construction, paving and architectural coating and total construction is expected to occur over the span of 22 years (2025-2047). The demolition phase was set span two days considering the small size of the structure on the site. Additionally, construction equipment was adjusted to incorporate Tier 4 Engine Controls in accordance with Mitigation Measure HRA-1.

Construction Phase Reduction Strategies (CalEEMod Version 2022.1.1.1)

The following reduction strategies were incorporated into the model to account for recent legislation in the state of California and local policies provided by the San Joaquin Valley Air Pollution Control District. In accordance with Regulation VIII – Fugitive PM10 Prohibitions, the regulation requires dust suppression during construction during earthmoving activities (demolition, excavation, extraction), and along paved and unpaved roads. Therefore, reduction measures were incorporated to reflect these local requirements, which are shown below:

- Use Dust Suppressants
- Water Exposed Surfaces
- Water Active Demolition Sites
- Water Unpaved Construction Roads

Construction Emissions

The implementation of the Project would generate air pollutant emissions from entrained dust, offroad equipment, vehicle emissions, architectural coatings, and asphalt pavement application. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM10 and PM2.5 emissions. The Project would implement various dust control strategies and would be required to comply with SJVAPCD Regulation VIII to control dust emissions generated during the grading activities. Proposed construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites and unpaved roads two times per day depending on weather conditions. Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of ROGs, NOx, CO, PM10, and PM2.5. The application of architectural coatings, such as exterior application/interior paint and

other finishes, and of asphalt pavement would also produce ROG emissions; however, the contractor is required to procure architectural coatings from a supplier in compliance with the requirements of SJVAPCD's Rule 4601 (Architectural Coatings) and limit the amount of ROG emissions from cutback asphalt in compliance with the requirements of SJVAPCD's Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). Pursuant to Regulation VIII, Rule 8021, Section 6.3, the Project would be required to develop, prepare, submit, obtain approval of, and implement a dust control plan, which would reduce fugitive dust impacts to less than significant for Project construction.

Table 4-12 presents the estimated emissions generated during construction of the Project. The full CalEEMod estimates can be found with the Initial Study attached asAppendix A2 of this report.

Table 4-12. Projected Construction Emissions

	CO (tpy)	ROG (tpy)	SOx (tpy)*	NOx (tpy)	PM10 (tpy)	PM 2.5 (tpy)
Emissions Generated from Project Construction	**4.68**	**4.29**	**0.01**	**2.54**	**0.02**	**0.02**
SJVAPCD Thresholds of Significance	**100**	**10**	**27**	**10**	**15**	**15**
*Threshold established by SJVAPCD for SOx, however emissions are reported as SO2 by CalEEMod.						

Sources: CalEEMod Detailed Report (2025); SJVAPCD

Long-Term Emissions

Implementation of the proposed Project would result in long-term emissions associated with mobile, energy, and area sources. Operational emissions from these factors were calculated using CalEEMod. The full CalEEMod Report can be found with the Initial Study attached as Appendix A2 of this report.

Operational Phase Modeling Parameters

As mentioned previously, the fleet mix that was used for the residential portion was the "District Accepted Fleet Mix for Residential Projects", which was established by the SJVAPCD (See Referenced Materials). For area-wide operational emissions, adjustments were made to Consumer Products and Architectural Coatings, the emission factor in grams per liter was updated to reflect the current standards set by Rule 4601, which was adopted by the SJVAPCD. The levels of each architectural coating product was set to 50 g/L ("Rule 4601: Architectural Coatings, 2020). Additionally, no fireplaces were assumed for the apartment and small-lot homes. For the operational fleet mix, the District Accepted Fleet Mix from the SJVAPCD was used in place of the residential fleet mix (2013).

Operational Phase Reduction Strategies (CalEEMod Version 2022.1.1.1)

Several reduction strategies were entered into the "Measures" portion of the model to reflect local policies and most recent state legislation. Under Title 24 Section 5.106.5.3.1 of the California Green Building Code, EV Charging Infrastructure must be included in the commercial portion of the Project. According to its requirements, the Project must include 35 parking spaces capable of providing EV charging equipment. Another requirement under Title 24 is Section 150.1, which mandates the installation of solar panels on all residential and nonresidential structures. According to the Hanford Municipal Code Section 12.08.090, which states that plants shall be selected based on its adaptability to local climatic conditions of the Project site. The Project site is located within an region characterized by low rainfall and high-heat in the warm months, so drought-tolerant landscaping would be reasonably expected. Lastly, recent California legislation, Assembly Bill 1346 was passed, which prohibits the selling of gas-powered landscaping equipment. The Project will not be operational until the year 2040, so it can be reasonably assumed that Zero Emission, non-gas-powered landscaping will be utilized by its operational year. A summary of all reduction strategies that were included in the model is provided below:

- EV Charging Infrastructure
- Solar Panels on all Buildings
- Use Drought-Tolerant Landscaping
- Zero Emission Landscaping

Operational Emissions

The Project would involve construction of low-, medium-, and high-density residences, a commercial center, a park space, and a school. Operation of the Project would generate ROG, NOx, CO, SOx, PM10, and PM2.5 emissions from mobile sources, including vehicle trips from passenger vehicles; area sources, including the use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; and energy sources, including combustion of fuels used for space and water heating. As discussed previously, pollutant emissions associated with long-term operations were quantified using CalEEMod Version 2022.1.1.1 for area, energy, and mobile sources, and were primarily based on CalEEMod default values. Table 4-14 presents the annual area, energy, mobile, off-road, and stationary source emissions associated with operation (year 2040) of the Project. Details of the emissions estimates are provided with the Initial Study attached as Appendix A2.

As shown in Table 4-13 below, the Project's operational emissions exceed the thresholds established by the SJVAPCD, evenwith the incorporation of mitigation measures HRA-1 and AQ-1. These mitigation measures include using low-VOC paint and cleaning supplies, Tier 4 Engine Controls, Low VOC Construction Equipment, and Low VOC Cleaning Supplies during operation.

Table 4-13. Projected Operational Emissions

	CO (tpy)	ROG (tpy)	SOx (tpy)	NOx (tpy)	PM10 (tpy)	PM 2.5 (tpy)
CalEEMod Mitigation Measures Included						
Emissions Generated from Project Operation	**49.9**	**19.5**	**0.14**	**10.9**	**0.30**	**0.30**
SJVAPCD Thresholds of Significance	**100**	**10**	**27**	**10**	**15**	**15**
*Threshold established by SJVAPCD for SOx, however emissions are reported as SO2 by CalEEMod.						

Sources: CalEEMod Detailed Report (2025); SJVAPCD

As shown in Table 4-12, Project construction emissions will not exceed SJVAPCD thresholds of significance. Project operational emissions, however, would exceed the SJVAPCD's operational thresholds as shown in Table 4-13. Therefore, Mitigation Measures AQ-1 and HRA-1 will be implemented to reduce air quality impacts resulting from cumulatively considerable increases in criteria pollutants. These mitigations include low VOC architectural coatings, VOC educational programs, and Tier 4 engine controls.

Since the Project is anticipated to exceed SJVAPCD thresholds of significance, even with implementation of Mitigation Measures AQ-1and HRA-1Therefore, the Project may conflict with or delay the implementation of the SJVAPCD attainment plans. The impacts resulting from CEQA Threshold a would remain significant and unavoidable. Cumulative impacts related to Threshold a would remain significant and unavoidable.

Threshold 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less than Significant with Mitigation (Class II). None of the criteria pollutant emissions from construction or on-site operation would exceed the 100 pound per day applicability threshold for AAQA. Therefore, according to SJVAPCD thresholds of significance, the Project would not be expected to cause or contribute to a violaon of any AAQS. Impacts to ambient air quality would be less than significant with migaon incorporated, and no further modeling or calculation is required.

Ambient Air Quality Standards (AAQS) set the criteria for clean air and are designed to safeguard the health of the most vulnerable members of our communities. These standards establish the maximum allowable concentration of a pollutant in outdoor air, averaged over a specific timeframe, to prevent harmful effects on both people and the environment. The SJVAPCD recommends an Ambient Air Quality Assessment (AAQA) be prepared when on-site

emissions of any criteria pollutants equal or exceed 100 pounds per day of any criteria pollutant to determine whether a new or modified stationary source will cause or make worse a violation of a State or National ambient air quality standard.

As shown below in Table 4-14, the project would exceed 100 pounds per day for both CO and ROG; therefore an operational ambient air quality assessment was performed and is discussed in this section.

Table 4-14. Criteria Pollutant Emissions Compared to the AAQA Threshold

	CO (lbs/day)	ROG (labs/day)	SOx (lbs/day)*	NOx (lbs/day)	PM10 (lbs/day)	PM 2.5 (lbs/day)
Max Daily Emissions Generated from Operation (Mitigated)	**395**	**133**	**1.06**	**85.4**	**2.33**	**2.29**
SJVAPCD Thresholds of Significance (AAQA)	**100**	**100**	**100**	**100**	**100**	**100**
*Threshold established by SJVAPCD for SOx, however emissions are reported as SO2 by CalEEMod.						

Sources: CalEEMod Detailed Report (2025); SJVAPCD (2018)

Core Environmental prepared an AAQA (Appendix F) for the Project which determined the Project could result in air quality impacts from short-term construction and long-term operational emissions. The short-term construction related emissions were typically from exhaust emissions (Nox, PM, CO) from construction equipment, as well as fugitive dust emissions (PM) from earthmoving activities. The operational emissions come from both permitted and non-permitted equipment and activities. The largest source of operational emissions from mobile sources (vehicle trips), followed by activities (consumer products and landscaping), and energy sources (building hearing and cooling, lighting, and equipment).

Before refining the analysis for onsite emissions, the total maximum daily emissions were evaluated against the 100 lb/day threshold set by CARB. All construction related pollutants fell below that level and therefore where not included in the AAQA because not further analysis is required (see Table 4-14 above).

Similarly, all operational emissions fell below the 100 lb/day threshold, with the exception of ROG and CO (Table 4-14). Although total daily emissions of operational ROG and CO exceed the threshold, the majority of these emissions were attributed to vehicle trips traveling to and from off-site locations, with some land uses averaging trip distances over seven miles. In accordance with the methodology outlined in both the AAQA prepared by Core Environmental

(Appendix F) and SJVAPCD policies (GAMAQI, APR 2030), total ROG and CO emissions were converted into onsite emissions, incorporating area and energy emissions along with the onsite portion of mobile emissions. This includes the ¼-mile offsite distance specified by APR 2030. The calculated onsite operation emissions are summarized and compared to the 100 lb/day threshold below in Table 4-15:

Table 4-15. On-Site Maximum Daily Operational Emissions Compared to Threshold

Pollutant	MOBILE	AREA	ENERGY	TOTAL	Exceed Threshold?
ROG	**15.3**	**52**	**0.7**	**68**	**NO**
CO	**73.8**	**3.3**	**6.1**	**83.2**	**NO**

SOURCE: Appendix F – AAQA Results

None of the criteria pollutant emissions from construction or on-site operaon would exceed the 100 pound per day applicability threshold for AAQA. Therefore, according to SJVAPCD thresholds of significance, the Project would not be expected to cause or contribute to a violation of any AAQS. Impacts to ambient air quality would be less than significant with mitigation incorporated, and no further modeling or calculation is required. The mitigation measures already included as a result of the HRA have already been factored into the emissions estimates for the AAQA; therefore no further mitigation is necessary beyond the measures already incorporated into the Mitigation Monitoring and Reporting Program (Appendix D).

Threshold C: Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant with Mitigation (Class II). A Health Risk Assessment (HRA) was prepared by Core Environmental Consulting in July 2024, which was used as the basis for the assessment of toxic air contaminants (TACs) and health impacts as a result of the proposed Project. The full HRA can be found in Appendix C of this Draft EIR.

The Project would result in toxic air contaminant (TAC) emissions during construction and, to a limited extent, during operation. The primary TAC emissions resulting from Project construction would include diesel particulate matter (DPM), which consists of particulate matter 2.5 microns and smaller (PM2.5) exhausted during the operation of on-and-off-road diesel-fueled vehicles and equipment. DPM is the particulate component of diesel exhaust and has been identified

as a TAC by the California Air Resources Board (CARB) based on its potential exposures and health concerns. Epidemiological studies strongly suggest a relationship between occupational diesel exhaust exposure and lung cancer. A number of adverse acute and chronic effects have also been associated with exposure to diesel exhaust.

Construction Phase. Sensitive receptors are defined as areas where young children, chronically ill individuals, the elderly, or people who are more sensitive than the general population reside, such as schools, hospitals, nursing homes, and daycare centers. Sensitive receptors include nearby residences to the south and east, with the closest being approximately 51 feet (15.5 meters) away. The residence is within the triangular cutout portion of the Project site, which is located on the northern portion of the Project site. A total of 85 nearby receptors were selected for a representative analysis. SJVAPCD recommended parameters were used throughout. Results of the AERMOD modeling and ADMRT calculations are attached in Appendix C, along with a map of receptors.

During the construction phase the Project would produce diesel particulate matter (DPM), which has been classified as a carcinogen. DPM is the particulate component of diesel exhaust and has been identified as a TAC by the California Air Resources Board (CARB) based on its potential exposures and health concerns. Epidemiological studies strongly suggest a relationship between occupational diesel exhaust exposure and lung cancer. A number of adverse acute and chronic effects have also been associated with exposure to diesel exhaust.

According to the Health Risk Assessment prepared by Core Environmental Consulting, (Appendix C), construction risk would be below the SJVAPCD Thresholds of Significance. The construction results are shown in Table 4-17, below.

Table 4-17. HRA Results Compared to SJVAPCD Thresholds of Significance

Risk	Carcinogen (risk in one million)	Acute Hazard Index	Chronic Hazard Index
Construction	5.5	n/a	0.001
GDF Operation	0.38	0.04	0.00
Thresholds of Significance	20	1	1

Source: Appendix C HRA Results

Notes: Hazard indices are for Maximally Exposed Individual and Includes Tier 4 Engine Controls for Off-Road Diesel Equipment; GDF is "gas dispensing facility"

As shown in the Table above, construction and operation risk would be below the SJVAPCD Thresholds of Significance. The results include implementation of Mitigation Measure HRA-1, described in Section 4.9.5 below. Therefore, consistent with the CEQA Guidelines, the Project would not expose sensitive receptors to substantial pollutant concentrations, and this impact would be considered less-than-significant with mitigation incorporated.

Operational Phase. Once operational, diesel-fueled vehicle and equipment use would be minimal and would not result in a substantial health risk. Thus, the primary TAC emissions would result from operating the Gasoline Dispensing Facility (GDF). Gasoline is a complex mixture of multiple substances. Over the years, CARB has identified many TAC in gasoline. The CARB Gasoline Service Sta-on Industrywide Risk Assessment Technical Guidance 11 focuses on seven TAC with OEHHA health values: benzene, ethyl benzene, n-hexane, propylene (or propene), naphthalene, xylenes, and toluene. Emissions primarily occur during loading, breathing, fueling, spillage, and hose permeation. Additional health risk could occur from the use of household cleaners, commercial products, landscaping equipment, and a number of other area sources; however, the health risk impact from these sources would be less than significant because existing federal and state regulations are enforced for the composition, use, and disposal of hazardous materials. This HRA is thus focused on construction DPM and operational emissions from the GDF.

The GDF would result in less-than-significant impacts and is not required to implement mitigation measures. SJVPACD Regulation II (Permits) requires An Authority to Construct (ATC) application to be submitted to SJVAPCD prior to construction of the GDF. The permitting process would include additional analysis and the application of permitting conditions with some of the most stringent emissions control requirements in the nation. Phase I and Phase II EVR would be required.

As shown in the Table 4-17 above, construction and operation risk would be below the SJVAPCD Thresholds of Significance. The results include implementation of Mitigation Measure HRA-1, described below. Therefore, consistent with the CEQA Guidelines, the Project would not expose sensitive receptors to substantial pollutant concentrations, and this impact would be considered *less than significant with mitigation incorporated.*

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

Less than Significant (Class II). Some typical construction-related odors would be generated during Project construction. As mentioned in Threshold C, the Project is adjacent to sensitive receptors to the north and southeast, which may be temporarily affected by such odors. The majority of the Project site is separated by large parcels of agricultural or vacant land, with only a minor portion of the Project being adjacent to sensitive receptors. The residential properties to the north are separated by Prosperity Avenue, making the home approximately 36-40 feet away from the northern Project boundary. The sensitive receptors to the east are more distanced, with the closest point being approximately 200 feet from the southeast Project boundary. 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). Project construction may create objectionable odors, but the odors would be temporary and would not affect a substantial number of people. The operational phase is solely residential

development, so there are no objectionable odors that would result from this phase of the Project. The overall impact is *less than significant.*

4.9.5 Mitigation Measures

Mitigation Measure HRA-1: Implement Tier 4 Engine Controls for all off-road, diesel-fueled equipment during construction.

Mitigation Measure AQ-1: Use Low-VOC Paints for Construction and VOC Educational Program.

Prior to construction, the Project applicant or its designee shall provide evidence to the City of Hanford that the applicant/phase developer has implemented the use of Low VOC Architectural Coatings (Paint) products for use on all residential and non-residential interiors and exteriors, including parking lots, during the "architectural coating" phase of construction. The products used must have a VOC content less than or equal to 50 grams per liter.

Additionally, the Project applicant or its designee must provide evidence to the City of Hanford that the applicant/phase developer has developed a Green Cleaning Product and Architectural Coating education program to be made available at rental offices, leasing spaces, and/or on websites.

4.9.6 Level of Significance After Mitigation

Threshold A and B. Significant and Unavoidable. With the incorporation of AQ-1 for low VOC paints and a VOC educational program during the operational phase, the Project would result in significant and unavoidable impacts for Thresholds A and B, due to multiple criteria pollutants exceeding thresholds established in SIPs and other air quality plans prepared by the San Joaquin Valley Air Pollution Control District. Moreover, the criteria pollutants would reasonably result in a cumulatively significant impact by contributing to emissions for pollutants for which the region is already in non-attainment for.
Threshold C and D. Less than significant. The use of Tier 4 engine controls is consistent with U.S. EPA, CARB, and SJVAPCD goals for implementing mitigation measures that directly reduce DPM emissions. According to the CalEEMod analysis, implementation of Mitigation Measure HRA-1 would reduce worst-year annual DPM emissions by approximately 69%, resulting in a less than significant impact

4.10 Hazards and Hazardous Materials

This section describes the existing hazards and hazardous materials on the Project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed Project. This section

assesses potential effects on hazards and hazardous materials that could result from implementation of the proposed Project.

Information contained in this section is based on a review of the list of hazardous waste and substances sites (Cortese List) in accordance with California Government Code Section 65962.5, as well as the following:

- Appendix A2 – Phase 1 Environmental Site Assessment, prepared by Technicon Engineering Services, Inc. (2022)
- Appendix A2 – Water Supply Assessment, prepared by 4Creeks, Inc. (2022)

Other sources consulted are listed in Section 8, References.

No comments were received from the Department of Toxic Substances Control in response to the Notice of Preparation. The Notice of Preparation and comments received are provided in Appendix A1.

4.10.1 Environmental Setting

The proposed Project is located in the City of Hanford. The Project proposes the development of 1,146 units of low, medium, and high-density residential development, Neighborhood Commercial development, public park space, a school zone, and a stormwater retention basin. The Project site consists of 304 acres of agricultural land comprised mainly of vineyards and orchards. The site is bordered by Fargo Avenue to the south, BNSF Railway to the east, Flint Avenue to the north, and 12th Avenue to the west.

A Phase I Environmental Site Assessment (ESA) was prepared for the Project site in March 2022 (with the Initial Study attached as Appendix A2). The Phase I Investigation consisted of but was not limited to a visual inspection of the site and surrounding properties, a review of available regulatory agency records and permits, aerial photographs, and interviews with persons knowledgeable of the site. The investigation was conducted in general accordance with the guidelines presented in American Society of Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process E1527-13. The Phase I ESA included a site reconnaissance, interviews with parties knowledgeable regarding the history of the site, review of regulatory agency records, review of historical records including aerial photographs to establish a site history to the earliest development of the site, and preparation of a report detailing the findings of the ESA including any recognized environmental conditions potentially affecting the site.

Present-day and historical information was reviewed and summarized to identify potential hazardous material impacts on the Project site, which are summarized as follows:

- **Storage Tanks.** An above-ground storage tank (AST) for the purposes of this report, is any tank that has a capacity to store more than 55 gallons of a hazardous substance or petroleum product and is substantially or totally above the ground surface. Does not include pressure tanks associated with a domestic well.
    - *Three ASTs were observed at the Site at the time of our December 16, 2021, site reconnaissance. Two approx. 3,000-gallon plastic fertilizer ASTs, one appearing empty, and the other nearly empty located in the clearing surrounding the shed. One approx. 1,000- gallon diesel AST observed inside the open-sided shed on December 16 had been later removed by the property owner as part of site cleanup activities which included removal of visibly stained surface soils on the shed's dirt floor.*
- **Hazardous Substances and Petroleum Products Containers.** Hazardous substances or petroleum products containers for liquids are generally less than 5 gallons and may be made of metal, glass, or plastic. Containers may also contain solids and gasses and may be made of paper, plastic, cardboard, or metal.
    - *A mixture of full and partially empty/empty containers of commercially available herbicides, fungicides, and DEF were observed on the ground in and around the open sided shed at the center of the Site. The floor of the shed was unpaved, and there was evidence of spilled agricultural chemicals at the time of the December 16, 2021, site reconnaissance. The agricultural chemical containers were later removed by the property owner as part of Site cleanup activities which also included removal of visibly stained surface soils on the shed's dirt floor.*
- **Stained or Corroded Soil, Pavements or Floors.** Observations of stained soil or pavement or staining or corrosion on floors, walls or ceilings are to be identified; this does not include staining from water.
    - *With the exception of what appeared to be small areas of surface staining from agricultural chemicals and/or fertilizers on the shed floor during our December 16, 2021, site reconnaissance, no stained or corroded soil, pavements or floors was observed at the Site. The agricultural chemical containers and AST were later removed by the property owner as part of Site cleanup activities which also included removal of visibly stained surface soils on the shed's dirt floor. The results of a soil sampling and analysis investigation of the shed floor following the stained soil removal are included in the full Phase 1 ESA found in Appendix A2.*
- **Pools of Liquid.** Pools of liquids include standing surface water, liquid spills, and liquids contained in sumps.
    - *Areas of standing water from recent rains were observed at the site.*
- **Solid Waste.** For the purposes of this report, solid waste includes areas that are apparently filled or graded by non-natural causes (or filled by fill of unknown origin) suggesting construction debris, demolition debris, or other solid waste disposal, or mounds or depressions suggesting trash or other solid waste disposal.

- *A few piles of debris were found in the clearing surrounding the shed, and near some of the wells.*

- **Polychlorinated biphenyls (PCBs).** PCBs were once widely used in dielectric and coolant oils in transformers and capacitors. PCB production was banned in the US in 1979, but some older transformers and electrical equipment may still contain PCBs. Many fluorescent light ballasts manufactured before 1979 also contained small quantities of PCBs. An inventory and inspection of fluorescent light ballasts was not conducted as part of this investigation.
    - *One pole-mounted transformer was observed at the Site, just to the south of the clearing with the shed in the center of the Site. There is no evidence of any leaks or spills of hazardous materials.*
- **Wells.** Observations of all wells, including water supply (drinking and irrigation), abandoned wells, dry wells, oil wells, injection wells, etc. are to be noted.
    - *Some wells were observed at the site. There is no evidence of leaks or spills of hazardous materials.*
- **Adjoining Properties.** Adjoining properties are those which are contiguous or partially contiguous with the site borders. Properties which are separated from the Site by streets, roads or other public thorough fares are considered adjoining. To the extent that the adjoining properties are visually or physically observable from the Site or publicly accessible areas, observations of the adjoining properties for the purposes of identifying possible recognized environmental conditions that could impact the site are presented below.
    - *North: Agricultural land and Hanford Christian School.*
    - *East: beyond Burlington Norther Railroad tracks.*
    - *Southeast: Hanford municipal well and water tank site.*
    - *South: Agricultural land and residential development beyond Fargo Avenue*
    - *West: Agricultural land and rural residence beyond 12th Avenue.*

4.10.1.1 Hazardous Material Sites

Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop a Cortese List that is updated at least annually. While the CalEPA no longer maintains a single Cortese List, CalEPA uses the following databases and lists to meet the requirements of Government Code Section 65962.5.

1. List of Hazardous Waste and Substances sites from Department of Toxic Substances Control (DTSC) EnviroStor database.
2. List of Leaking Underground Storage Tank Sites from the State Water Board's GeoTracker database.
3. List of solid waste disposal sites identified by State or Regional Water Board with waste constituents above hazardous waste levels outside the waste management unit.
4. List of "active" Cease and Desist Orders and Cleanup and Abatement Orders from State Water Board.

5. List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.

A search of the above-listed online databases was conducted to identify Cortese List sites on or adjoining the Project site, or those which could potentially impact the Project site, based on level of contamination, proximity to the Project site, and other environmental conditions. This search returned no Cortese-list sites identified on or adjoining the Project site.

In addition, there are hazardous material sites that do not meet the definition of a Cortese List site but still have hazardous material impacts that could impact construction or operation of the proposed Project. These may include voluntary cleanup sites or military cleanup sites. These are referred to herein as "non-Cortese List hazardous material sites." A search was conducted as part of the Assessment (with the Initial Study attached as Appendix A2) to identify non-Cortese List hazardous material sites on or adjoining the Project site, or those which could potentially impact the Project site based on level of contamination, proximity to the Project site, and other environmental conditions.

The Environmental Site Assessment (ESA) found no signs of hazardous substances or petroleum products on the property that could pose a risk of contamination. There is no indication of past contamination that has been managed with restrictions, nor any historical contamination that might still be a concern. Additionally, there are no legal claims on the property related to environmental cleanup costs (environmental liens).

4.10.1.2 Oil and Gas Wells and Pipelines

There are no oil or gas wells located on the Project site, nor is the Project site located within an oil and gas field. There are no petroleum or hazardous material pipelines identified on or within 1 mile of the Project site (NPMS 2022).

4.10.1.3 Schools

There are two schools located within one mile of the Project site. Hanford Christian Preschool adjoins the Project site to the north, at 11948 Flint Avenue, and Simas Elementary School, approximately 0.9 miles south of the Project site, at 1875 North Fitzgerald Lane. The Project also proposes the development of a 14.99-acre school zone.

4.10.1.4 Airports

There is one public use airport and one private helipad within close proximity of the Project site. These are Hanford Municipal Airport and Adventist Medical Center Hanford Helipad, respectively. Hanford Municipal Airport is located approximately 4 miles southeast of the Project site, and the Adventist Medical Center Hanford Helipad lies approximately 2.5 miles

south of the Project site. Neither of the airports are located within 2 miles of the Project site. The Project site is not located within either airport influence area, existing or proposed.

4.10.1.5 Fire Hazards and Emergency Response

The Project area falls within the response jurisdiction of the City of Hanford Fire Department for wildfire hazards and emergency response. The City of Hanford Fire Department's closest fire station is located at 350 W Grangeville Blvd, which is approximately 1.45 miles southeast of the Project site.

4.10.2 Regulatory Setting

Federal

U.S. Environmental Protection Agency

Title 40 USC, Chapter 1, Subchapter I, Parts 260–265 – Solid Waste Disposal Act/ Federal Resource Conservation and Recovery Act of 1976

The Solid Waste Disposal Act, as amended and revised by the Resource Conservation and Recovery Act (RCRA), establishes requirements for the management of solid wastes (including hazardous wastes), landfills, USTs, and certain medical wastes. The statute also addresses program administration; implementation and delegation to the states; enforcement provisions and responsibilities; research, training, and grant funding. Provisions are established for the generation, storage, treatment, and disposal of hazardous waste, including requirements addressing generator record keeping, labeling, shipping paper management, placarding, emergency response information, training, and security plans.

Title 40 USC, Chapter 1, Subchapter I, Part 273 – Universal Waste

This regulation governs the collection and management of widely generated waste, including batteries, pesticides, mercury-containing equipment, and bulbs. This regulation streamlines the hazardous waste management standards and ensures that such waste is diverted to the appropriate treatment or recycling facility.
Title 40 USC, Chapter 1, Subchapter D, Part 112 – Oil Pollution Prevention

Oil Pollution Prevention regulations require the preparation of a Spill Prevention, Control, and Countermeasure (SPCC) Plan if oil is stored in excess of 1,320 gallons in aboveground storage (or have a buried capacity of 42,000 gallons). SPCC regulations place restrictions on the management of petroleum materials and, therefore, have some bearing on hazardous materials management.

Title 40 USC, Chapter 1, Subchapter C, Part 61 – National Emission Standards for Hazardous Air Pollutants, Subpart M – National Emission Standard for Asbestos

This regulation established National Emission Standards for Hazardous Air Pollutants (NESHAP) and names asbestos-containing material (ACM) as one of these materials. ACM use, removal, and disposal are regulated by EPA under this law. In addition, notification of friable ACM removal prior to a proposed demolition project is required by this law.

Title 42 U.S. Code of Federal Regulations, Chapter 116 – Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) provides for public access to information about chemical hazards. The EPCRA and its regulations included in Title 40 USC Parts 350–372 establish four types of reporting obligations for facilities storing or managing specified chemicals: emergency planning, emergency release notification, hazardous chemical storage reporting requirements, and toxic chemical release inventory. EPA maintains a database, termed the Toxic Release Inventory, which includes information on reportable releases to the environment.

Title 15 USC, Chapter 53, Subchapter I, Section 2601 et seq. – Toxic Substances Control Act of 1976

The Toxic Substances Control Act (TSCA) of 1976 empowers EPA to require reporting, record-keeping, and testing, as well as to place restrictions on the use and handling of chemical substances and mixtures. This regulation phased out the use of asbestos and ACM in new building materials and also sets requirements for the use, handling, and disposal of ACM as well as for lead-based paint (LBP) waste. As discussed above, EPA has also established NESHAP, which govern the use, removal, and disposal of ACM as a hazardous air pollutant and mandate the removal of friable ACM before a building is demolished and require notification before demolition. In addition to asbestos, ACM, and LBP requirements, this regulation also banned the manufacturing of polychlorinated biphenyls (PCBs) and sets standards for the use and disposal of existing PCB-containing equipment or materials.

Regional Screening Levels (RSLs)

The federal EPA provides regional screening levels for chemical contaminants to provide comparison values for residential and commercial/industrial exposures to soil, air, and tap water (drinking water). RSLs are available on the EPA's website and provide a screening level calculation tool to assist risk assessors, remediation project managers, and others involved with risk assessment and decision-making. RSLs are also used when a site is initially investigated to determine if potentially significant levels of contamination are present to warrant further investigation. In California, the Department of Toxic Substances Control (DTSC) Human and Ecological Risk Office (HERO) incorporated the EPA RSLs into the HERO human

health risk assessment. HERO created Human Health Risk Assessment (HHRA) Note 3, which incorporates HERO recommendations and DTSC-modified screening levels (DTSC-SLs) based on review of the EPA RSLs. The DTSC-SL should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

U.S. Department of Labor, Occupational Safety and Health Administration (OSHA)

Title 29 USC, Part 1926 et seq. – Safety and Health Regulations for Construction

These standards require employee training; personal protective equipment; safety equipment; and written procedures, programs, and plans for ensuring worker safety when working with hazardous materials or in hazardous work environments during construction activities, including renovations and demolition projects and the handling, storage, and use of explosives. These standards also provide rules for the removal and disposal of asbestos, lead, LBP, and other lead materials. Although intended primarily to protect worker health and safety, these requirements also guide general facility safety. This regulation also requires that an engineering survey is prepared prior to demolition.

Title 29 USC, Part 1910 et seq. – Occupational Safety and Health Standards

Under this regulation, facilities that use, store, manufacture, handle, process, or move hazardous materials are required to conduct employee safety training; inventory safety equipment relevant to potential hazards; have knowledge on safety equipment use; prepare an illness prevention program; provide hazardous substance exposure warnings; prepare an emergency response plan and prepare a fire prevention plan.

State

California Health and Safety Code (HSC), Division 20, Chapter 6.11, Sections 25404–25404.9 – Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Under the California Environmental Protection Agency (CalEPA), the Department of Toxic Substances Control (DTSC) and Enforcement and Emergency Response Program (EERP) administer the technical implementation of California's Unified Program, which consolidates the administration, permit, inspection, and enforcement activities of several environmental and emergency management programs at the local level (DTSC 2019). Certified Unified Program Agencies (CUPAs) implement the hazardous waste and materials standards. This program was established under the amendments to the California HSC made by SB 1082 in 1994. The programs that make up the Unified Program are:

- Aboveground Petroleum Storage Act (APSA) Program
- Area Plans for Hazardous Materials Emergencies
- California Accidental Release Prevention (CalARP) Program

- Hazardous Materials Release Response Plans and Inventories (Hazardous Materials Business Plans, or HMBPs)
- Hazardous Material Management Plan (HMMP) and Hazardous Material Inventory Statements (HMIS)
- Hazardous Waste Generator and On-site Hazardous Waste Treatment (Tiered Permitting) Program
- Underground Storage Tank Program

The CUPA for the Project site is the Kings County Department of Public Health.

Title 22 CCR, Division 4.5 – Environmental Health Standards for the Management of Hazardous Waste

In the State of California, the Department of Toxic Substances Control (DTSC) regulates hazardous wastes. These regulations establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the California Hazardous Waste Control Act and federal RCRA. As with federal requirements, waste generators must determine if their wastes are hazardous according to specified characteristics or lists of wastes. Hazardous waste generators must obtain identification numbers; prepare manifests before transporting waste offsite; and use only permitted treatment, storage, and disposal facilities. Standards also include requirements for record-keeping, reporting, packaging, and labeling. Additionally, while not a federal requirement, California requires that hazardous waste be transported by registered hazardous waste transporters.

In addition, Chapter 31 – Waste Minimization, Article 1 – Pollution Prevention and the Hazardous Waste Source Reduction and Management Review of these regulations require that generators of 12,000 kilograms/year of typical, operational hazardous waste evaluate their waste streams every 4 years and, as applicable, select and implement viable source reduction alternatives. This Act does not apply to non-typical hazardous waste, including ACM and PCBs, among others.

Title 22 California HSC, Division 20, Chapter 6.5 – California Hazardous Waste Control Act of 1972

This legislation created the framework under which hazardous wastes must be managed in California. It provides for the development of a state hazardous waste program (regulated by DTSC) that administers and implements the provisions of the federal RCRA program. It also provides for the designation of California-only hazardous wastes and development of standards that are equal to or, in some cases, more stringent than, federal requirements. The CUPA is responsible for implementing some elements of the law at the local level.

Human Health Risk Assessment Note 3 – DTSC-Modified Screening Levels (DTSC-SLs)

HHRA Note Number 3 presents recommended screening levels (derived from the EPA RSLs using DTSC modified exposure and toxicity factors) for constituents in soil, tap water, and ambient air. The DTSC-SL should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

Title 22 California HSC, Division 20, Chapter 6.67, Sections 25270–25270.13 – Aboveground Petroleum Storage Act

This law applies if a facility is subject to SPCC regulations under Title 40 U.S.C. Part 112, or if the facility has 10,000 gallons or more of petroleum in any or combination of ASTs and connecting pipes. If a facility exceeds these criteria, it must prepare an SPCC plan.

Low-Threat Underground Storage Tank (UST) Case Closure Policy

This policy applies to petroleum UST sites subject to Chapter 6.7 of the Health and Safety Code. This policy establishes both general and media-specific criteria. If both the general and applicable media-specific criteria are satisfied, then the leaking UST case is generally considered to present a low threat to human health, safety, and the environment. This policy recognizes, however, that even if all of the specified criteria in the policy are met, there may be unique attributes of the case or site-specific conditions that increase the risk associated with the residual petroleum constituents. In these cases, the regulatory agency overseeing corrective action at the site must identify the conditions that make case closure under the policy inappropriate.

Regional Water Boards and local agencies have been directed to review all cases in the petroleum UST Cleanup Program using the framework provided in this policy. These case reviews shall, at a minimum, include the following for each UST case:

1. Determination of whether or not each UST case meets the criteria in this policy or is otherwise appropriate for closure based on a site-specific analysis.
2. If the case does not satisfy the criteria in this policy or does not present a low risk based upon a site-specific analysis, impediments to closure shall be identified.
3. Each case review shall be made publicly available on the State Water Board's GeoTracker web site in a format acceptable to the Executive Director.

Environmental Screening Levels

Environmental Screening Levels (ESLs) provide conservative screening levels for over 100 chemicals found at sites with contaminated soil and groundwater. They are intended to help expedite the identification and evaluation of potential environmental concerns at contaminated sites. The ESLs were developed by San Francisco Bay Regional Water Quality Control Board; however, they are used throughout the state. While ESLs are not intended to establish policy or regulation, they can be used as a conservative screening level for sites with

contamination. Other agencies in California currently use the ESLs (as opposed to RSLs). In general, the ESLs could be used at any site in the State of California, provided all stakeholders agree (San Francisco Bay RWQCB 2019). In recent experience, regulatory agencies in various regions use ESLs as regulatory cleanup levels. The ESLs are not generally used at sites where the contamination is solely related to a leaking underground storage tank (LUST); those sites are instead subject to the Low-Threat Underground Storage Tank Closure Policy.

Title 24 of the CCR – California Building Standards Code

The California Building Standards Code is a compilation of three types of building standards from three different sources:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes;
- Building standards that have been adopted and adapted from the national model code standards to meet California conditions; and
- Building standards, authorized by the California legislature, constitute extensive additions not covered by the model codes that have been adopted to address particular California concerns.

Among other rules, the Code contains requirements regarding the storage and handling of hazardous materials. The Chief Building Official at the local government level (i.e., Kings County) must inspect and verify compliance with these requirements prior to issuance of an occupancy permit.

California Emergency Services Act

Under the Emergency Services Act (California Government Code, Section 8550 et seq.), the State of California developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the plan, which is administered by the Governor's Office of Emergency Services. The Office of Emergency Services coordinates the responses of other agencies, including the EPA, California Highway Patrol, Regional Water Quality Control Boards, air quality management districts, and county disaster response offices.
California Accidental Release Prevention Program

Similar to the EPA Risk Management Program, the California Accidental Release Prevention (CalARP) Program (19 CCR 2735.1 et seq.) regulates facilities that use, or store regulated substances, such as toxic or flammable chemicals, in quantities that exceed established thresholds. Under the regulations, industrial facilities that handle hazardous materials above threshold quantities are required to prepare and submit a hazardous materials business plan (HMBP) to the local CUPA via the California Environmental Reporting System. As part of the HMBP, a facility is required to specify applicability of other state regulatory programs. The overall purpose of CalARP is to prevent accidental releases of regulated substances and reduce the severity of releases that may occur. The CalARP Program meets the requirements

of the EPA Risk Management Program, which was established pursuant to the Clean Air Act Amendments.

Local

San Joaquin Valley Air Pollution Control District

The San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 4002 is the adoption of the US EPA NESHAP rules, which limit toxic air pollutants, including ACM. SJVAPCD Rule 3050 requires asbestos removal fees for all demolitions or renovations over 260 linear feet, 160 square feet, or 35 cubic feet where ACM are present and will be disturbed. SJVAPCD Regulation VIII, Rules 8011 through 8081, prohibit and limit particulate emissions (PM10) in various types of activities that create fugitive dust. This includes construction, demolition, excavation, and other earthmoving activities (Rule 8021).

Kings County Department of Public Health

The Division of Environmental Health Services (EHS), a regulatory component of the Kings County Department of Public Health, is the CUPA agency for the Project site. The Division of Environmental Health Services is responsible for overseeing aboveground, underground, and petroleum storage tanks; the County's CalARP program; hazardous material emergency response; hazardous materials business plans (HMBPs); household hazardous waste handling and disposal; and the generation and treatment of hazardous wastes. Permitting and reporting required for each of these programs is completed through Kings County EHS.

Kings County General Plan

The Kings County General Plan includes the Health and Safety Element of the General Plan, including airport hazards, hazardous materials, fire hazards, and emergency response (County of Kings 2010).

Airport Hazards

HS OBJECTIVE C3.2 Increase public safety by designating an "Airport Area of Influence" around public airports and implementing the policies of the "Kings County Airport Land Use Compatibility Plan."

- **HS Policy C3.2.1:** Integrate by reference the Kings County Airport Land Use Compatibility Plan, Compatibility Criteria, and associated maps and procedural policies.
- **HS Policy C3.2.2:** Regulate properties adjacent to the Hanford Municipal Airport according to the Primary Compatibility Criteria of the Health and Safety Element, and Kings County Airport Land Use Compatibility Plan maps.

Hazardous Materials

HS OBJECTIVE B1.5 Ensure adequate protection of County residents from new generations of toxic or hazardous waste substances.

- **HS Policy B1.5.1:** Evaluate development applications to determine the potential for hazardous waste generation and be required to provide sufficient financial assurance that is available to the County to cover waste cleanup and/or site restoration in instances where the site has been abandoned or the business operator is unable to remove hazardous materials from the site.

Urban and Wildland Fire Hazards

HS OBJECTIVE C2.2 Provide quality fire protection services throughout the County by the Kings County Fire Department, and Fire safety preventative measures to prevent unnecessary exposure of people and property to fire hazards in both County Local Responsibility Areas and State Responsibility Area.

- **HS Policy C2.2.1:** Community planning efforts should evaluate the projected need for Fire Department personnel and equipment and necessary funding support to maintain current levels of service as community growth occurs.

Emergency Response

HS OBJECTIVE C2.3 Emergency Operations Center remains prepared, organized and capable of responding to disasters or incidences of a significant nature or magnitude that require coordinated multi-agency response.

- **HS Policy C2.3.1:** The Kings County Office of Emergency Management maintains and updates the County's Emergency Response Plan in coordination with responding County agencies that serve to perform Management, Operations, Planning and Intelligence, Logistics, and Administration and Finance functions.

HS OBJECTIVE C2.4 Ensure maintenance and upkeep of key emergency access routes, and critical facilities and infrastructure to minimize delays or disruptions in emergency response.

- **HS Policy C2.4.1:** Prioritize the maintenance of Primary Access Routes, as defined by the County's Emergency Response Plan, which serve as established disaster evacuation routes.

City of Hanford General Plan

Hazardous materials

Goal H5: Protection from the harmful effects of hazardous materials.

Goal H6: Avoidance of properties contaminated by toxic or hazardous materials.

- **Policy H32 Project Review Evaluation:** Evaluate the risks involving the disposal, transport, manufacture, storage and handling of hazardous material in Hanford in the project review process.
- **Policy H34 Sensitive Receptors:** Avoid siting uses with new sensitive receptors near existing industrial facilities that use or produce hazardous material or may emit toxic air contaminants.
- **Policy H36 Transport of Hazardous Materials:** Promote the safe transport of hazardous materials through Hanford by designating hazardous material carrier routes to direct hazardous materials away from populated and other sensitive areas and prohibiting vehicles transporting hazardous materials from parking on City streets. Coordinate with the California Highway Patrol to maintain designated travel routes through the Hanford Area for vehicles transporting hazardous materials.

Urban and Wildland Fire Hazards

Goal H4: Quality fire protection services throughout the City of Hanford.

- **Policy H27 Fire Code:** Ensure that all new buildings are constructed to current Fire Code Standards.
- **Policy H28 Weed Abatement:** Continue with an intensive weed abatement program to minimize fire hazards near urban uses.

Emergency Preparedness

Goal H1: Reduced impacts to human life, property, the local economy, and the environment resulting from natural hazards, human-trade hazards, and noise.

Goal H2: High quality emergency services to protect life and property.

- **Policy H10 Emergency Routes:** Continue to collaborate with Kings County Office of Emergency Management to establish and maintain an Emergency Operations Plan that includes identification of Hanford's emergency evacuation routes and operational needs for first responders.
- **Policy H11 Emergency Response Facilities:** Establish the capability to relocate critical emergency response facilities such as fire, police and essential services facilities, if needed.

4.10.3 Thresholds and Methodology

The significance criteria used to evaluate the Project impacts related to hazards and hazardous materials are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to hazards and hazardous material would occur if the Project would:

a. *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.*
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.*
c. *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.*
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 result, would it create a significant hazard to the public or the environment.*
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.*
f. *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.*
g. *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.*

Methodology

Health risk from operation of the gas dispensing facility (GDF) was evaluated using the 2022 CARB & CAPCOA Gasoline Service Station Industrywide Risk Assessment Screening Tool. Annual throughput (892,000 gallons per year) was estimated by dividing the total volume of gas sales (58 million gallons) by the total number of gas stations (64) throughout Kings County. The tool's calculated hourly dispensing and loading throughputs, based on the annual throughput, were used along with the regional meteorological data. The control scenario included Enhanced Vapor Recovery (EVR) Phase I and EVR Phase II controls as they will be required as part of the permitting process for the GDF.

4.10.4 Project Impacts

Threshold 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 (Class III): Project construction activities may involve the use, storage, and transport of hazardous materials. During construction, the contractor will use fuel trucks to refuel onsite equipment and may use paints and solvents to a limited degree. The storage, transport, and use of these materials will comply with Local, State, and Federal regulatory requirements. There is the potential for small 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.

During operation, the Project will consist of residential and commercial uses, including a gas station. The residential portion of the Project would include the use of household cleaners, commercial products, landscaping equipment, and a number of other area sources; however, the health risk impact from these sources would be less than significant because existing federal and state regulations are enforced for the composition, use, and disposal of hazardous materials. Hazardous materials associated with small commercial developments include commercial cleaners, motor oil, solvents, and waste expected from small commercial operations. The hazardous materials associated with the residential and small commercial portion would not be of the type and quantity that would pose a significant hazard to the public. The gas station, however, would contain hazardous materials including waste fuel (gasoline or kerosene), spent spill cleanup absorbents, spent filters, and catchment basin waste. Gas stations are considered hazardous waste generators and have the potential to be released, causing harm to the environment and human health. Because of the gas station, the Project would routinely transport, use, or dispose of hazardous materials that could pose a significant hazard to the public if released or improperly stored.

In order to assess the potential hazards to the public associated with the gas station, a Health Risk Assessment (HRA) was prepared by Core Environmental Consulting for the Project and is included in Appendix C of this EIR. The primary TAC emissions would result from operating the Gasoline Dispensing Facility (GDF). Gasoline is a complex mixture of multiple substances. Over the years, CARB has identified many TACs in gasoline. The CARB Gasoline Service Station Industrywide Risk Assessment Technical Guidance focuses on seven TACs with OEHHA health values: benzene, ethyl benzene, n-hexane, propylene (or propene), naphthalene, xylenes, and toluene. Emissions primarily occur during loading, breathing, fueling, spillage, and hose permeation.

Results of the construction and operational risk assessments are compared to SJVAPCD thresholds of significance in Table 4-16, below. The highest risk exposure occurred for different locations onsite: receptor 13, east of the site, for construction DPM; and receptor one, southwest of the site, for the GDF.

Table 4-3. HRA Results Compared to SJVAPCD Thresholds of Significance

Risk	Carcinogen (risk in one million)	Acute Hazard Index	Chronic Hazard Index
Construction	5.5	n/a	n/a
GDF Operation	0.38	0.04	0.00
Thresholds of Significance	20	1	1

Notes: Hazard indices are for Maximally Exposed Individual. Includes Tier 4 Engine Controls for Off-Road Diesel Equipment

Sources: Appendix C HRA Results, Gasoline Service Stationn Risk Tool Results

As shown in Table 4-18 above, the GDF health risk is far below thresholds, and does not pose a significant hazard to the public based on TAC emissions. The transport, use and disposal of hazardous gas station materials will be subject to SJVPACD Regulation II (Permits), which requires An Authority to Construct (ATC) application to be submitted to SJVAPCD prior to construction of the GDF. The permitting process would include additional analysis and the application of permitting conditions with some of the most stringent emissions control requirements in the nation. As part of this, Phase I and Phase II Enhanced Vapor Recovery (EVR) Controls would be required, which are designed to reduce the emissions of volatile organic compounds from gasoline dispensing facilities. Therefore, the impact is *less than significant.*

Threshold 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 (Class III): The Project's construction would involve the use of diesel fuel to power construction equipment, gasoline, solvents, architectural coatings, and equipment lubricants. Additionally, there will be frequent transportation of gas and diesel fuel due to the proposed gas station. These materials, however, are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols in the Hanford municipal code. Should an accidental hazardous release occur, or should the Project encounter hazardous soils, 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 handling and proper disposal. Therefore, potential impacts are *less than significant.*

Threshold 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?

Less than Significant (Class III): The Project is located close to existing residences and proposes a school as well as 1,146 residential units on the Project site. The nearest sensitive receptors to the Project site perimeter include a residence approximately 51 feet (15.5 meters) away, within the triangular cutout portion of the Project site, near the middle of the northern perimeter; a school (Hanford Christian School), approximately 73 feet (22.3 meters) north of the northwest corner; and a residence approximately 100 feet (30.5 meters) west of the site.

The Project would involve the use or storage of hazardous substances such as small amounts of pesticides, fertilizers, cleaning agents required for the normal maintenance of structures and landscaping as well as the gasoline and fuel waste associated with gas stations. The Project would emit hazardous emissions or involve the handling of hazardous materials or waste associated with the proposed gas station and is within one-quarter mile of an existing school

and a proposed school. The gas station would involve emissions that may also be hazardous to the sensitive receptors surrounding the Project site to the north, south and east.

Potential toxic air contaminants (TACs) that may be released from the GDF include benzene, toluene, ethylbenzene, xylenes, naphthalene, propylene, and n-Hexane, which pose risks to human health. The HRA prepared by Core Environmental Consulting characterized potential cancer and noncancer health impacts to the public as part of the SJVAPCD's air toxics program. According to the HRA prepared for the Project, out of one million individuals exposed to the carcinogens, an estimated 0.38 individuals are expected to develop cancer over their lifetime. The SJVAPCD established threshold for carcinogens is 20 in one million, indicating that the health risk associated with the GDF is far below thresholds. Likewise, the non-carcinogenic acute hazard health risk was 0.04 compared to a threshold of 1. See Table 4-16 for the HRA results and Appendix C for the full report.

As shown in Table 4-16 above, the GDF health risk is far below thresholds, and does not pose a significant hazard to the public based on hazardous TAC emissions. Additionally, the transport, use and disposal of hazardous gas station materials will be subject to SJVPACD Regulation II (Permits), which requires An Authority to Construct (ATC) application to be submitted to SJVAPCD prior to construction of the GDF. The permitting process would include additional analysis and the application of permitting conditions with some of the most stringent emissions control requirements in the nation. As part of this, Phase I and Phase II Enhanced Vapor Recovery (EVR) Controls would be required, which are designed to reduce the emissions of volatile organic compounds from gasoline dispensing facilities. Therefore, the impact is *less than significant.*

Threshold D: Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65762.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact (Class III): The Project site is not listed as a hazardous materials site according to the Cortese List compiled under Government Code Section 65962.5 for hazardous waste facilities (CalEPA, n.d.). There would be *no impact.*

Threshold 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.

No Impact (Class III): The proposed Project is located approximately 3.1 miles northwest of the nearest public airport (Hanford Municipal Airport) and is not located in an airport land use plan, according to the Airport Master Plan (City of Hanford 2010). Implementation of the proposed Project would not result in a safety hazard for people residing or working in the Project area. There is *no impact.*

Threshold F: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

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

Threshold G: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

No Impact (Class III). The Project site is not located in or near a wildfire hazard safety zone, and is surrounded by areas designated for residential, commercial and educational facility land uses. As such, the Project would not expose people or structures to significant risk due to wildland fires. *No impact* would occur.

4.10.5 Mitigation Measures

No mitigation measures are required.

4.10.6 Level of Significance After Mitigation

As detailed above, the potential impacts of the proposed Project were found to be less than significant with no mitigation required.

4.11 Effects Found Not to Be Significant

As detailed in the Initial Study (Appendix A2), the following environmental topics were determined to have no impact, less-than-significant impacts without mitigation, or less-than-significant impacts with mitigation incorporated. These topics are not analyzed further in this EIR. A brief summary of the findings for each topic is provided below.

Aesthetics
The proposed Project would not substantially degrade the existing visual character or quality of the site and its surroundings, nor would it create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Impacts related to scenic vistas, scenic resources, and visual quality in non-urbanized areas are less than significant, consistent with the City's General Plan policies for preserving visual resources and regulating outdoor lighting.

Agriculture and Forestry Resources

The proposed Project would convert Prime Farmland to non-agricultural uses; however, no mitigation will be needed for the loss of farmland. This is because this site was previously evaluated under the "Bellagio" project, and at the time, agriculture mitigation was not required. Since the current Project has the same footprint and the agricultural impact remains unchanged, the loss of agricultural land was previously analyzed and mitigation was deemed unnecessary. Additionally, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract, result in the loss of forest land, or involve other changes in the environment that could lead to the conversion of farmland or forest land to non-agricultural or non-forest uses. All impacts are less than significant.

Biological Resources

The Project would not have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. It would also not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community. Impacts to riparian habitat, federally protected wetlands, wildlife movement corridors, and conflicts with local policies or habitat conservation plans are less than significant with the incorporation of mitigation measures such as pre-construction surveys for nesting birds and avoidance of sensitive habitats.

Cultural Resources

The Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the CEQA Guidelines, nor would it disturb any human remains, including those interred outside of formal cemeteries. Impacts to archaeological resources are less than significant with mitigation measures requiring monitoring during ground-disturbing activities and procedures for unanticipated discoveries.

Energy

The Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation. It would also not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Energy consumption during construction and operation was calculated to be consistent with applicable standards, resulting in less-than-significant impacts.

Geology and Soils

The Project would not directly or indirectly cause potential substantial adverse effects involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides. It would also not result in substantial soil erosion or the loss of topsoil, be located on unstable geologic units or expansive soils, or involve soils incapable of adequately supporting septic tanks or alternative wastewater disposal systems. Impacts related to the destruction of unique paleontological resources or geologic features are less than significant with adherence to the California Building Code and mitigation for unanticipated discoveries.

Greenhouse Gas Emissions
The Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. It would also not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions. Projected operational GHG emissions are below applicable thresholds, resulting in less-than-significant impacts.

Hydrology and Water Quality
The Project would not violate any water quality standards or waste discharge requirements, substantially decrease groundwater supplies or interfere with groundwater recharge, or substantially alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion, siltation, flooding, or exceedance of stormwater drainage systems. It would also not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts in flood hazard areas, tsunami or seiche zones, or related to impeding or redirecting flood flows are less than significant with implementation of stormwater management plans and best management practices.

Land Use and Planning
The Project would not physically divide an established community or 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. The Project is consistent with the City's General Plan and zoning designations, resulting in less-than-significant impacts.

Mineral Resources
The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state, nor would it affect a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No mineral resources are identified on the site, leading to no impact.

Noise
The Project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity exceeding standards established in the local general plan or noise ordinance. It would also not generate excessive groundborne vibration or noise levels, nor be located within the vicinity of a private airstrip or an airport land use plan where it would expose people to excessive noise levels. Construction and operational noise impacts are less than significant with standard controls.

Population and Housing
The Project would not induce substantial unplanned population growth in an area, either directly or indirectly, nor would it displace substantial numbers of existing people or housing necessitating the construction of replacement housing elsewhere. Population and housing projections align with regional plans, resulting in less-than-significant impacts.

Public Services
The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, or other public facilities. Impacts are less than significant with payment of applicable fees and adherence to service standards.

Recreation
The Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration would occur or be accelerated. It also does not include recreational facilities or require their construction or expansion that might have an adverse physical effect on the environment. Impacts are less than significant.

Tribal Cultural Resources
The Project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074. Consultation under AB 52 did not identify any tribal cultural resources, and impacts are less than significant with mitigation for unanticipated discoveries.

Utilities and Service Systems
The Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. It would have sufficient water supplies available, not result in a determination that wastewater treatment facilities are inadequate, generate solid waste in excess of standards, or fail to comply with federal, state, and local management and reduction statutes related to solid waste. Impacts are less than significant.

Wildfire
The Project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. It would not substantially impair an adopted emergency response plan or evacuation plan, exacerbate wildfire risks due to slope or prevailing winds, require infrastructure that may exacerbate fire risk, or expose people or structures to significant risks from post-fire runoff, landslides, or flooding. There is no impact.

5 Cumulative Effects

The California Environmental Quality Act (CEQA) requires an environmental impact report (EIR) to analyze cumulative impacts. The purpose of this chapter is to explain the methodology for the cumulative analyses and present the potential cumulative effects of the FNC Farming Subdivision (Project or proposed Project).

Section 15355 of the State CEQA Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."

Section 15130 of the State CEQA Guidelines provides guidance for analyzing significant cumulative impacts in an EIR. The discussion of cumulative impacts "need not provide as great detail as is provided for the effects attributable to the project alone," but instead is to be "be guided by standards of practicality and reasonableness" (14 CCR 15130[b]). CEQA requires that cumulative impacts be discussed when the "project's incremental effect is cumulatively considerable" (14 CCR 15130 [a]). Additionally, Section 15130(a)(1) clarifies, "an EIR should not discuss impacts which do not result in part from the project evaluated in the EIR."

Cumulative impacts can result from the combined effect of past, present, and future projects located in proximity to the project under review. Therefore, it is important for a cumulative impacts analysis to be viewed over time and in conjunction with other related past, present, and reasonably foreseeable future developments whose impacts might compound or interrelate with those of the project under review. The cumulative impacts analyze the extent to which the project would contribute to cumulative impacts, and whether that contribution would be considerable (i.e., would cause a cumulative condition to be significant and/or substantially increase the severity of a cumulative impact that would be significant whether or not the project was developed.)

5.1 Methodology

The CEQA Guidelines allow for the use of one of two alternative methods to determine the scope of projects for the cumulative impact analysis:

- List Method–A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency (Section 15130 (1)(A); and/or
- General Plan Projection Method–A summary of projections contained in an adopted General Plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact (Section15130(1)(B)). Such plans may include: a general plan, regional transportation plan, or plans for the

> reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency

For this Project, a hybrid approach that combines both the List Method and the General Plan Projection Method has been utilized to assess cumulative impacts. Since aspects of transportation, air quality, and hazardous materials are presented at a variety geographic and temporal scales, this approach will portray cumulative conditions more accurately.

To support the cumulative list aspect of this analysis, a project list was prepared of other past, present, or reasonably foreseeable Projects was developed through consultation with the City and County. Table 5-1 provides a list of these cumulative projects and their associated land use. For topics requiring the use of projections, information is also drawn from the City of Hanford General Plan and the Kings County General Plan and supporting EIR's for those plans. The land use map in the General Plan identifies the ultimate land use pattern and development potential of the adopted General Plan, and the EIR addresses the environmental effects associated with buildout of these land uses. The list shown in Table 5-1 is not intended to encompass every development project in the region; rather, it identifies the projects with the greatest potential for impacts that would overlap with those of the proposed project.

CEQA defines "probable future projects" as those with an active application at the time the NOP was released for a project (in this case, August 16th, 2024). The list of projects in Table 5-1 were used in the development and analysis of the cumulative settings and impacts for each resource topic. Past and current projects in the Project vicinity (1-mile radius) were also considered as part of the cumulative setting as they contribute to the existing conditions upon which the Project and each probable future project's environmental effects are compared.

Table 5-1. City of Hanford Cumulative Project List

Project	Location	Proposed Zone	Number of Residential Units	Map No.
Downtown Improvements Project	North Douty Street and 7th Street	MX-D	N/A	1
Hanford Place	South of San Joaquin Valley Railroad, North of SR-198, Campus Drive cuts through site (north/south direction)	C-H	304	2

Lunaria/Tentative Tract Map 938	South of Hanford Armona Road, east of 10 1/2 Avenue	R-L-5	457	3
Stonehaven Annexation	Within Hanford city limits, south of Hanford Armona Road, between 12th & 13th Avenues.	R-L-5	82	4
Liberty Pointe	North of Grangeville Boulevard, west of the railroad tracks, east of Kings Road.	R-L-8	55	5
Grangeville Mixed Use Development	Northwest of the intersection of Grangeville Boulevard and Centennial Drive within the City of Hanford.	MX-N	64 MFR[2] 1.25-acre commercial zone	6
Silicon Valley Ranch	Bound by Hanford Armona Road to the north, Greenbrier Road to the east, and 13th Avenue to the west.	R-L-5	326	7
Hanford Dairy Manufacturing Plant	San Joaquin Valley Railroad to the north, Lacey Boulevard to the south, and planned High-Speed Rail to the east. (Unincorporated Kings County)	IL	N/A	8
Neves Subdivision	Northwest corner of Fargo Avenue and 12th Avenue	AL-10 (County)	615	9

5.1.1 Cumulative Impact Analysis

Section 15130(b)(3) of the State CEQA Guidelines states that "lead agencies shall define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used." Unless otherwise indicated in the analysis in Section 4 of this Draft EIR, the geographic scope used in the cumulative analysis includes those projects listed in Table 5-1 and depicted in Figure 5-1.

However, there are environmental issues whose relevant geographic scope for purposes of the cumulative impact analysis may be larger or smaller than this area, and may be defined by local, regional, or state agency jurisdiction or by other environmental factors. One example is the geographic scope of cumulative air quality impacts, defined by the San Joaquin Valley Air Basin (SJVAB), which consists of eight counties and is spread across 25,000 square miles of Central California. Whereas the geographic scope of cumulative transportation impacts is limited to the City of Hanford.

[2] Multi-family residential

The analyses in Sections 5.1.1.1 through 5.1.1.3 of this Draft EIR address whether, after adoption of Project-specific mitigation, the residual impacts of the proposed Project would (1) contribute considerably to an existing/anticipated (with the Project) cumulatively significant effect; or (2) cause a new cumulatively significant impact. A cumulative impact is not considered significant if the impact can be mitigated to below the level of significance through mitigation. This Draft EIR examines "reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project" (14 CCR 15130[a][3] and 15130[b][5]).

For the purposes of this EIR, the Fargo Village Project would result in a significant cumulative effect if:

- The cumulative effects of related projects (past, current, and probable future projects) are not significant, and the incremental impact of implementing the Fargo Village Project is substantial enough when added to the cumulative effects of related projects to result in a new cumulatively significant impact;
- The cumulative effects of related projects (past, current, and probable future projects) are already significant, and implementation of the Fargo Village Project makes a considerable contribution to the effect. The standards used herein to determine a considerable contribution are that either the impact must be substantial or must exceed an established threshold of significance

This cumulative analysis assumes that all mitigation measures identified in Sections 1 and 4 to mitigate project impacts are adopted. The analysis herein analyzes whether, after adoption of project-specific mitigation, the residual impacts of the project would cause a cumulatively significant impact or would contribute considerably to existing and anticipated (without the Project) cumulatively significant effects.

Where the project would contribute, additional mitigation is recommended where feasible. Based on the analysis presented in the Initial Study (Appendix A2), this EIR addresses three issues: transportation impacts, specifically VMT, potential air quality impacts to sensitive receptors and potential hazards to the public due to the operation of a gas station on the site. A detailed analysis of the cumulative impacts associated with all relevant issue areas are presented in subsections 5.1.1.1 through 5.1.1.3, below. No other environmental issue areas were included in the cumulative impact analysis because they did not contain any impacts above "less than significant", as explained in the Initial Study (Appendix A2).

Geographic Extent

The analysis of cumulative effects considers a number of variables including geographic (spatial) limits, time (temporal) limits, and the characteristics of the resource being evaluated. The area within which a cumulative impacts can occur is within the City of Hanford and the San Joaquin Valley Air Basin (SJVAB). Transportation effects have a more limited geographic scope and are typically localized around nearby residential uses that are more likely to

generate trips and to the greater incorporated City of Hanford, at most. Air quality impacts, specifically to sensitive receptors, would include a 2-mile radius of the Project site, but potential air quality impacts would extend to the greater SJVAB. Hazards and hazardous materials have a similar scope to transportation, as the potential impacts for this issue area are related to impacts to nearby residents. Those who may be affected by the release of hazardous materials during normal operation would be within a radius of roughly 2-miles of the Project site. For this reason, the total geographic scope for the analysis of cumulative impacts includes the immediate Project vicinity (2-mile radius), the City of Hanford, and the San Joaquin Valley Air Basin.

5.1.1.1 Transportation

There are a total of two intersections the vicinity of the Project site currently experiencing periodic queuing issues during peak hours without the Project, which is results in a deficient level of service (LOS) as identified by the General Plan. The addition of the Project would result in additional traffic that would exacerbate these conditions under the Near Term plus Project traffic conditions and Cumulative Year (2042) plus Project conditions. The Cumulative Year Plus Project scenario identifies eight intersections that would operated at a deficient LOS. As such, improvement measures required to mitigate the Project's level of service include fair share contributions as to roadway improvements as detailed in MM T-17 through T-20. With the implementation of these mitigation measures and roadway improvements, the Project is anticipated to operated at a satisfactory LOS during the Cumulative Year (2042) with the Project.

The geographic scope of transportation impacts would be the City of Hanford, as defined in the *VMT Analysis* prepared by LSA Associates (with the Initial Study attached as Appendix A2). As shown in Figure 5-1, the Neves Subdivision residential project is located immediately west of the Project's boundaries. Therefore, transportation related Project impacts would be greater when viewed in conjunction with Neves Subdivision, which proposes 611 residential units.

The geographic scope of the *City of Hanford VMT Thresholds and Implementation Guidelines* (2022) is the City of Hanford. This document served as the basis for the methodologies and significant threshold criteria that were used in the VMT Analysis prepared for the Project. As described in Section 4.8.4, the VMT per capita resulting from the proposed Project must be at least 13% below Kings County Regional Thresholds in order to deemed less than significant (City of Hanford VMT Guidelines 2022). The Project did not meet this threshold and exceeded the threshold by 14.2%, which results in significant VMT impacts. Residential projects are only able to decrease VMT with certain methods, primarily by increasing transit use or providing more employment opportunities and complementary land uses near the residences. These methods are difficult to achieve in suburban areas as compared to dense urban areas. There are several project design features that have been incorporated into the Project as a good-faith effort to reduce VMT impacts to a less than significant level; however, due to the uncertainty and lack

of localized substantial evidence of the VMT reduction through such design features, it was concluded that there is no feasbile mitication that can be applied to the project beyond these design features that would result in a less than significant impact. . Since this effect cannot be mitigated in any way, the proposed Project's incremental contribution to the significant cumulative effect would remain *cumulatively considerable* and *significant and unavoidable.*

5.1.1.2 Air Quality

Construction activities associated with the Project would result in less than significant construction-related regional and localized air quality impacts, as quantified under Threshold A in Section 4.9.4 of this EIR. Short-term cumulative impacts related to air quality could occur if construction of the Project and other cumulative projects in the surrounding area were to occur simultaneously. In particular, with respect to local impacts, the consideration of cumulative construction particulate (PM10 and PM2.5) impacts is limited to cases when projects constructed simultaneously are within a few hundred yards of each other because of (1) the combination of the short range (distance) of particulate dispersion (especially when compared to gaseous pollutants), and (2) the SJVAPCD's required dust-control measures, which further limit particulate dispersion from the Project site. No residential developments are planned for construction simultaneously to the proposed Project (See Figure 5-1) and within close vicinity of the Project,

SJVAPCD's policy with respect to cumulative impacts associated with the above-referenced pollutants and their precursors is that impacts that would be directly less than significant on a project level would also be cumulatively less than significant (SJVAPCD2015). Because the Project's construction emissions are below the SJVAPCD's regional and local construction significance thresholds, the Project's regional and local construction emissions would not be cumulatively considerable, and the cumulative impact would be *less than significant*, and no mitigation measures are required.

In regard to TACs, because impacts are localized and the SJVAPCD thresholds of significance for TACs have been established at an extremely conservative level, risks that equal or exceed the individual thresholds of significance are also considered cumulatively significant (SJVAPCD 2015). With implementation of Mitigation Measure HRA-1 Tier 4 Engine Controls, the potential impacts to sensitive receptors were deemed to be *less than significant*. No other cumulative risk thresholds would apply. The SJVAPCD has not established cumulative significance thresholds regarding odor impacts. Air quality impacts from the construction phase have been deemed *less than cumulatively considerable.*

5.1.1.3 Hazards and Hazardous Materials

Project construction activities may involve the use, storage, and transport of hazardous materials. During construction, the contractor will use fuel trucks to refuel onsite equipment and may use paints and solvents to a limited degree. The storage, transport, and use of these

materials will comply with local, state, and federal regulatory requirements. There is the potential for small 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.

During operation, the Project will consist of residential and commercial uses, including a gas station. The residential portion of the Project would include the use of household cleaners, commercial products, landscaping equipment, and a number of other area sources; however, the health risk impact from these sources would be less than significant because existing federal and state regulations are enforced for the composition, use, and disposal of hazardous materials. Hazardous materials associated with small commercial developments include commercial cleaners, motor oil, solvents, and waste expected from small commercial operations. The hazardous materials associated with the residential and small commercial portion would not be of the type and quantity that would pose a significant hazard to the public. The gas dispensing facility (GDF), however, would contain hazardous materials including waste fuel (gasoline or kerosene), spent spill cleanup absorbents, spent filters, and catchment basin waste. Gas stations are considered hazardous waste generators and have the potential to be released, causing harm to the environment and human health.

As demonstrated in Section 4.10.4 Project Impacts, the potential carcinogenic health risk resulting from toxic air contaminant (TAC) emissions associated with the GDF were far below the thresholds of significance established by the SJVAPCD (Table 4-16). Although the GDF is considered a hazardous waste generator, the transport, use and disposal of hazardous gas station materials will be subject to SJVPACD Regulation II (Permits), which requires An Authority to Construct (ATC) application to be submitted to SJVAPCD prior to construction of the GDF. The permitting process also includes additional analysis and the application of permitting conditions with some of the most stringent emissions control requirements in the nation. As part of this, Phase I and Phase II Enhanced Vapor Recovery (EVR) Controls would be required, which are designed to reduce the emissions of volatile organic compounds from gasoline dispensing facilities. An existing and future school is also located within one-quarter mile of the GDF, however, as previously described, the quantity of TAC emissions do not pose as a significant health risk and would be further reduced by the SJVAPCD's ATC permit. Since all hazards/hazardous materials risks would remain *less than significant* individually, impacts would be *less than cumulatively considerable.*

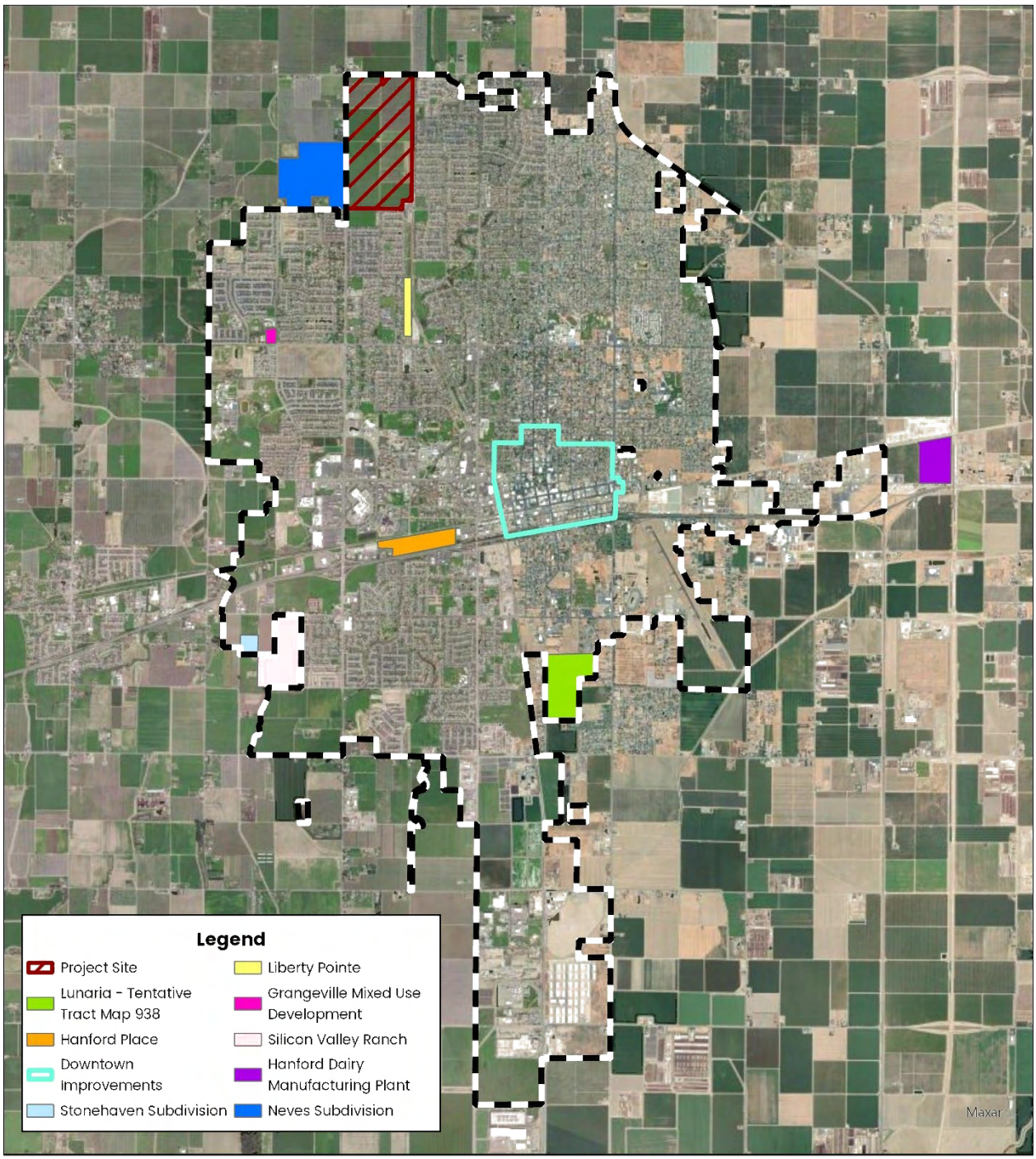

Figure 5-1. Cumulative Impacts Map

6 Alternatives Analysis

6.1 Introduction

Pursuant to the State California Environmental Quality Act (CEQA) Guidelines, environmental impact reports (EIRs) are required to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives" (14 CCR 15126.6(a)). This alternatives analysis is prepared in support of CEQA's goals to foster informed decision making and public participation (14 CCR 15126.6(a)). An EIR is not required to evaluate the environmental impacts of alternatives at the same level of detail as the proposed project, but it must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project.

Section 15126.6(a) of the State CEQA Guidelines requires the following:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR should consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for the selection of a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.*

The alternatives analysis is required even if the alternatives "would impede to some degree the attainment of the project objectives or would be more costly" (14 CCR 15126.6(b)). An EIR must evaluate "only those alternatives necessary to permit a reasoned choice" (14 CCR 15126.6(f)) and does not need to consider "every conceivable alternative" to a project (14 CCR 15126.6(a)). The alternatives evaluated should be "potentially feasible" (14 CCR 15126.6(a)), but inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is in fact "feasible." The final decision regarding the feasibility of alternatives lies with the decision makers for a given project who must make the necessary findings addressing the feasibility of alternatives for avoiding or substantially reducing a project's significant environmental effects (California Public Resources Code, Section 21081; see also 14 CCR 15091).

Section 15364 of the Guidelines defines "feasibility" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."

As discussed throughout Section 4, Environmental Analysis, of this Draft EIR, the Fargo Village Project (Project or proposed Project) would result in the following significant and unavoidable impacts:

Transportation

- Conflict or be inconsistent with the CEQA guidelines Section 15064.3, Subdivision (b).

The Alternatives analysis also considers those significant impacts of the Project that could be reduced to less-than-significant levels with mitigation, as listed in Table 1-1, Summary of Project Impacts, in Section 1, Executive Summary. These topics were considered in the development of viable Project Alternatives that could lessen environmental effects of the Project. To a lesser extent, the Alternatives analysis also considers those impacts of the proposed Project in which mitigation is not necessary.

6.2 Project Objectives

Section 15124(b) of the CEQA Guidelines requires that an EIR include a statement of the project objectives that "include the underlying purpose of the project and may discuss the project benefits." The following objectives have been identified for the Project:

1) Make productive use of the underutilized property by developing the site with residential, commercial, and public facility uses while staying consistent with the current City of Hanford General Plan and the Kings County Development Code.
2) Increase the available single-family and multi-family residential housing stock within the City of Hanford.
3) Build an integrated, high quality mixed-use development with a range of low, medium, and high-density residential uses to offer homeownership opportunities attainable to a variety of income levels.
4) Connect future development with the existing community, reducing the strain on the utilities.
5) Expand the Hanford community.

6.3 Feasibility

The CEQA Guidelines (Section 15364) define feasibility as:

> *…. capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.*

In addition, the CEQA Guidelines Section 15126.6(f)) states that in determining the range of alternatives to be evaluated in the EIR, the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other regulatory limitations, jurisdictional boundaries, and proponent's control over alternative sites. The feasibility of potential alternatives has been assessed by taking the following factors into account:

Legal Feasibility: Does the alternative have the potential to avoid lands that have legal protections that may prohibit or substantially limit the feasibility of permitting the proposed Project?
Regulatory Feasibility: Does the alternative have the potential to avoid lands that have regulatory restrictions that may substantially limit the feasibility of, or permitting of, the proposed Project?
Technical Feasibility: Is the alternative feasible from a technological perspective, considering available technology? Are there any construction, operational, or maintenance constraints that cannot be overcome?
Environmental Feasibility: Would implementation of the alternative cause substantially greater environmental damage than the proposed Project, thereby making the alternative clearly inferior from an environmental standpoint?

This screening analysis does not focus on relative economic factors or the costs of the alternatives (as long as they are found to be economically feasible). CEQA Guidelines require consideration of alternatives capable of eliminating or reducing significant environmental effects even though they may "impede to some degree the attainment of Project objectives or would be more costly", as stated previously in Section 6.1, Introduction (CEQA Guidelines Section 15126.6[b]).

6.4 Alternatives Considered and Rejected

This section describes and evaluates the alternative that did not meet the CEQA criteria defined in Section 6.1. The following list outlines the single alternative that was addressed in this section, with an explanation as to why the alternative was eliminated.

- Alternative Sites

6.4.1 Alternative Sites

No alternative offsite locations have been identified at this time. Even if the Project applicant obtained site control of other nearby properties able to support the proposed Project, there

would be no significant reduction in the VMT impact of the Project, as these nearby properties do not exhibit enhanced features that would contribute to low VMT, such as proximity/high density of transit stops, increased connectivity, greater diversity of land use or increased walkability (Office of Planning & Research, 2018). Additionally, these nearby Traffic Analysis Zones (TAZs) are also over the threshold for VMT and would still contribute to a significant impact if the Project were to be relocated. Therefore, development of the proposed Project at a different location would not substantially alter the generated VMT as the Project would remain in the City of Hanford or the greater Kings County and still occur in an area with a high value for VMT.

Additionally, an alternative site alone would not have any effect on the potential for health risks associated with TACs or the operation of the GDF, because alternative sites within City limits would also be within close proximity of sensitive receptors. Therefore, an offsite alternative would not meet CEQA requirements for alternatives, as described in Section 6.3, as the alternative does not substantially reduce or avoid significant impacts of the Project. Further, although the applicant does have control over other properties in the City, each of these properties are being developed with other residential Projects, and therefore the lands would not be available as an alternative location for the proposed Project, making this alternative infeasible.

6.5 Alternatives Analyzed

Alternatives Retained for Analysis

The range of alternatives considered in this analysis was identified through the consideration of:

- Any comments received during the public and agency scoping process, and
- Alternatives identified by the EIR Team as a result of its independent review of the proposed Project's impacts.

Consistent with Section 15126.6(e) of the CEQA Guidelines, the alternatives analysis includes consideration of the No Project Alternative. The analysis of the No Project Alternative must discuss existing conditions as they occurred at the time that a Project's NOP was published, as well as "what would be reasonably expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services" (CEQA Guidelines Section 15126.6 [e][2]). The requirements also specify that "[i]f disapproval of the Project under consideration would result in predictable actions by others, such as the proposal of some other Project, this 'no Project' consequence should be discussed" (CEQA Guidelines Section 15126.6 [e][3][B]).

This section describes and evaluates the alternatives that meet the CEQA criteria defined in Section 6.1 and thus, have been retained for the EIR's alternatives analysis. A description of those alternatives that did not meet CEQA's criteria for further evaluation is provided in Section

6.4, with an explanation as to why alternatives were eliminated from further consideration. The "Environmentally Superior Alternative" is addressed in Section 6.6. No other alternatives meeting the CEQA criteria defined in Section 6.1 have been identified.

To comply with CEQA's requirements, each alternative that has been developed for this analysis has been evaluated in three ways:

1) Does the alternative accomplish all or most of the basic objectives of the proposed Project?
2) Is the alternative potentially feasible (from environmental, legal, technological, and regulatory standpoints)?
3) Does the alternative avoid or substantially lessen any significant effects of the proposed Project (including consideration of whether the alternative itself could create significant effects potentially greater than those of the proposed Project)?

6.5.1 Alternative 1: No Project Alternative

Description
Under Alternative 1, the proposed Project would not be constructed, and the Project site would remain undeveloped.

Objectives
Alternative 1 would not meet all the Project objectives because the site would remain vacant and would not be developed with residential units and supporting utilities and infrastructure. This alternative would not meet objectives pertaining to increasing the available residential housing stock in the City of Hanford, expanding the Hanford community, or providing homeownership opportunities.

Impact Analysis by Discipline

Transportation
The proposed Project would not be built under Alternative 1 and would not add vehicle traffic. Therefore, this alternative would not contribute to VMT in the Project area.

Air Quality
Under this Alternative, no construction or operational emissions would result. Thus, this alternative would not pose any health risk to sensitive receptors or contribute to existing pollution levels in the region.

Hazards and Hazardous Materials

The proposed Project would not be constructed, so no hazards or hazardous materials would be stored, transported, or used on the site and there would be no potential risks to nearby sensitive receptors.

Conclusion: Alternative 1
The Project site would remain undeveloped; therefore, this Alternative would not generate any VMT, air pollutants, or hazardous materials. No transportation, air quality or hazardous materials impacts would result from this Alternative.

6.5.2 Alternative 2: Change in Housing Mix Alternative Description

Alternative 2 consists of developing the site with residential homes, identical to the proposed Project, but with a decrease in the number of single-family homes, and an increase in the number of multi-family homes. Therefore, the number of proposed units would remain the same, with a change in the mix of housing type. The Project site is zoned R-L, low density residential, R-M, medium density residential, and R-H, high density residential with a minimum lot size of 5,000 sf on the entire low-density portion of the site. Under the current proposal, the Project would have 926 single family homes and 218 apartment units.

Under Alternative 2, the number of low-density single-family residences to be developed within the site would be reduced and the number of multi-family homes would be increased. This would result in 590 single-family homes being built under Alternative 2 (a reduction of 120 single-family homes). This reduction ensures that the current low density residential zoning designation would not need to change and would still apply to Alternative 2. This alternative additionally proposes in increase in town homes and apartment units by 120 units, divided evenly between the two housing types. Therefore, the resulting unit count would be 590 low-density units, 216 small lot single family, and 278 apartment units. The reduction of single-family units and increase in higher density units that Alternative 2 proposes can potentially reduce the VMT per capita to below the 13% threshold, but due to the uncertainty of the effectiveness and lack of substantial evidence available, there is no guarantee that this alternative would reduce the VMT to less than significant levels.

Comparative Analysis of Environmental Effects

Under Alternative 2, it is assumed that development in the project area would result in a smaller development footprint of approximately 84 acres when compared to the proposed Project, because this Alternative proposes a higher proportion of high-density housing. The reduced Project footprint would result in impacts that are less severe or similar to the those of the proposed Project as detailed below. It is assumed that all mitigation required for the Project will be implemented for this Alternative.

Transportation

Reducing the number of single-family homes built from 710 (Proposed Project) to 590 (Alternative 2) would reduce VMT generated under this alternative. This alternative proposes a reduction of 120 homes, which may reduce the VMT per capita to a number that is at least 13% below the regional average established by the City of Hanford VMT Guidelines. Based on the VMT analysis values provided in Chapter 4.8 (Transportation), a reduction in VMT of 4.2% would be necessary to achieve a minimum 13% reduction to avoid a significant unavoidable VMT impact. Therefore, comparing the number of homes and VMT generated between the proposed Project and Alternative 2, Alternative 2 could reduce VMT by at least 13%, which could potentially prevent a VMT impact due to an increase in the density of homes. Increasing housing density may affect the distance people travel and provide greater options for the chosen mode of travel, which may reduce VMT impacts.

However, a linear analysis would not be accurate, because the homes would remain in the same Traffic Analysis Zone (TAZ), and automobile transportation is still heavily relied upon in the area. Additionally, the increase in residents due to higher densities may negate the potential for VMT reductions in this community. Therefore, a 13% reduction in VMT should not be expected. Alternative 2 could potentially meet the 13% reduction in VMT, but it is not guaranteed. Additionally, there is no density bonus, so existing zoning may be a barrier to developing this number of multi-family homes with both compliant and desirable densities.

Air Quality

The SJVAB has been designated as a nonattainment area for O3, PM10, and PM2.5 under national and/or California standards. Because development of Alternative 2 is similar in nature to the proposed Project, it is assumed that Alternative 2's annual construction emissions would not exceed the SJVAPCD significance thresholds for VOC, NOx, CO, SOx, PM10, or PM2.5 during construction in all construction years. In addition, this Alternative's combined annual area, energy, and mobile source emissions would not be expected to exceed the SJVAPCD's operational thresholds for CO, SOx, PM2.5, VOC, NOx and PM10. Due to the increase in housing density, these impacts would be less when compared to the proposed Project. However, despite air quality impacts being less than significant at a project level, due to the SJVAPCD being in a nonattainment status, cumulative impacts would be significant and unavoidable.

Similar to the proposed Project, MM HRA-1 would be implemented during Project operation, which would reduce potential TAC impacts to sensitive receptors to a less than significant level. TAC emissions resulting from the GDF would remain the same and would have a less than significant impact due to the implementation of additional SJVAPCD regulatory requirements for gas stations.

Hazards and Hazardous Materials

During the construction of Alternative 2, impacts related to transport, disposal, and handling of hazardous material would occur similar to those of the proposed Project. Implementation of federal, state, and local health and safety laws and regulations, particularly the SJVAPCD's Authority to Construct permit, would remove the potential for hazards related to the GDF, and the impact would similarly remain less than significant for Alternative 2. The Alternative 2 Project site would still be adjacent to Hanford Christian School and existing residential neighborhoods, however potential impacts of GDF emissions to these sensitive receptors would remain less than significant (Appendix C, Health Risk Assessment) and would be subject to all applicable local regulations. However, Alternative 2 would increase the housing density on the Project site, but the number of sensitive receptors near the site as well as the commercial portion would not change, so impacts regarding hazards would remain less than significant.

Conclusion: Alternative 2

Alternative 2 could potentially reduce VMT by the 13% threshold to avoid a significant impact. However, it cannot be guaranteed that it would reduce VMT past the threshold. The homes would remain in the same TAZ, with a higher VMT than the County Average, and the percentage of homes reduced does not have a linear correlation with a percentage of VMT reduced. The single-family homes that would not be built for this Project would need to be built in another location to meet demands. The emission of criteria pollutants during operation would be slightly less due to the increased housing density on the site, but all other impacts regarding air quality would remain the same. Similarly, impacts related to hazards would remain less than significant, as the commercial portion would be the same as the proposed Project. The zoning designations at the site may interfere with the addition of more multi-family units considering the amount of space available on the site for medium and high-density residential homes. However, the alternative would support the goal of supplying housing to various income levels.

Alternative 3: Development of Commercial Area Only

Description

Under the Development of Commercial Area Only Alternative, only the 6.73-acre neighborhood commercial center would be constructed and operated at the corner of 12th Avenue and Fargo Avenue. No residential areas, school, central park, or bike trails would be developed as part of this alternative. Approximately 297.27 acres of the site would remain vacant or under agricultural production and the agricultural storage building would remain on-site.

Comparative Analysis of Environmental Effects

Under Alternative 3, it is assumed that development in the project area would occur on 6.73 acres in the southwest corner of the site. The reduced scale of development would result in

impacts that are less severe or similar to the those of the proposed Project as detailed below. It is assumed that all mitigation required for the project would be implemented for this Alternative.

Transportation

Alternative 3 would reduce development of the Project site to only 6.73-acres of neighborhood commercial development and the remaining approximately 297.27 acres would remain vacant or in agricultural production. As such, transportation impacts would be far less than those of the proposed Project as only a small portion of the Project site would be developed and traffic numbers resulting from Alternative 3 would be greatly reduced when compared to the proposed Project. As such, VMT impacts would be reduced to less than significant levels under this alternative.

Air Quality

The SJVAB has been designated as a nonattainment area for O3, PM10, and PM2.5 under national and/or California standards. Due to the development of only 6.73 acres of land to commercial uses, it is assumed that Alternative 3's annual construction emissions would not exceed the SJVAPCD significance thresholds for VOC, NOx, CO, SOx, PM10, or PM2.5 during construction in all construction years. In addition, it is assumed that the combined annual area, energy, and mobile source emissions would not be expected to exceed the SJVAPCD's operational thresholds. Although the SJVAPCD is in a nonattainment area for the State 1-hour O3, 8-hour O3, PM10, and PM2.5 standards and is a nonattainment area for National 8-hour O3 and PM2.5 standards, the small area of development would not contribute a cumulative air quality impact. Under this Alternative the GDF would still be constructed, so the impact of TACs on nearby residents and schools would be similar to that of the proposed Project, which is less than significant with implementation of MM HRA-1.

Hazards and Hazardous Materials

During the construction of Alternative 3, impacts related to transport, disposal, and handling of hazardous material would occur similar to those of the proposed Project, as the GDF would still be constructed. Implementation of federal, state, and local health and safety laws and regulations would remove the potential for hazards related to Project operation. The Alternative 3 Project site would still be adjacent to Hanford Christian School and existing residential areas, however potential impacts would be mitigated by MM HRA-1 and zoned accordingly to the City of Hanford and Kings County zoning ordinances and General Plans. However, Alternative 3 would reduce development of the Project site to approximately 6.73 acres. As such, impacts would be similar, but far less than those of the proposed Project.

6.6 Environmentally Superior Alternative

Section 6.5 describes and evaluates the two alternatives to the proposed Project. Table 5-1 presents a comparison of the potentially significant impacts of the proposed Project in comparison with the alternatives.

CEQA Guidelines Section 15126.6(d) requires the following for alternatives analysis and comparison:

> *The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the Project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the Project as proposed. (CEQA Guidelines Section 15126.6[d])*

If the environmentally superior alternative is the No Project Alternative, CEQA requires the identification of an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]). Based on the analysis provided in this EIR, the environmentally superior alternative is Alternative 3. However, this alternative would not meet the Project's objectives and would be disadvantageous to Hanford by preventing the development of single-family housing needed. Although Alternative 2 meets more of the Project's and City's objectives, this Alternative still proposes a large-scale development resulting in similar impacts to the proposed Project and would not be environmentally superior.

Table 6-1. Comparison of Alternatives

Environmental Issue	Alternative 1: No Project	Alternative 2: Change in Housing Mix	Alternative 3: Commercial Area Only
Air Quality			
a) Conflict with or obstruct implementation of the applicable air quality plan?	No impact	Less than Significant	Less than Significant
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?	No impact	Less than Significant	Less than Significant
c) Expose sensitive receptors to substantial pollutant concentrations?	No impact	Less than Significant with Mitigation	Less than Significant with Mitigation

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	No impact	Less than Significant	Less than Significant
Transportation			
a) Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	No impact	Less than Significant	Less than Significant
b) Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)?	No impact	Less than Significant	Less than Significant
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)?	No impact	Less than Significant	Less than Significant
d)Would the Project result in inadequate emergency access?	No impact	No Impact	No Impact
Hazards and Hazardous Materials			
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	No impact	Less than Significant	Less than Significant
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?	No impact	Less than Significant	Less than Significant
c) 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	Less than Significant	Less than Significant
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 to the public or the environment?	No impact	No impact	No impact
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?	No impact	No impact	No impact
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	No impact	No impact	No impact
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No impact	No impact	No impact

Other CEQA Considerations

Section 15126 of the State California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the environmental impact report (EIR) must also identify significant environmental effects of the proposed Project, significant environmental effects that cannot be avoided if the proposed Project is implemented, significant irreversible environmental changes that would result from implementation of the proposed Project, and growth-inducing impacts of the proposed Project.

6.7 Significant Environmental Effects

Section 1, Executive Summary, and Sections 4.8 through 4.10 in Section 4, Environmental Analysis, of this Draft EIR provides a comprehensive overview of the proposed Project's potential significant environmental effects, including the level of significance both before and after mitigation.

6.7.1 Environmental Effects Found Not to be Significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a Project were determined not to be significant and therefore, were not discussed in detail in the EIR. These are the environmental effects found not to be significant based on the site or Project characteristics, as documented in the Initial Study (see Appendix A2). The Initial Study includes the impacts that are not anticipated to occur, the issue area, and the justification. As discussed in the Initial Study, all impacts were found to be less than significant apart from transportation, air quality, and hazards/hazardous materials impacts. This was related to vehicle miles traveled and the release of toxic air emissions during construction and operation.

6.8 Significant and Unavoidable Environmental Impacts

Pursuant to State CEQA Guidelines Section 15126.2(b), an EIR must describe any significant environmental impacts that cannot be avoided, even with the implementation of feasible mitigation measures. As discussed throughout Section 4, Environmental Analysis of this Draft EIR, the Project would result in significant and unavoidable impacts related to transportation (Project and Cumulative). Because this impact cannot feasibly be mitigated to a less-than-significant level, it would remain significant and unavoidable. The remainder of all Project impacts can be mitigated to a less-than-significant level through the adoption of recommended mitigation measures. As discussed in Appendix A2 (Initial Study), all other Project impacts would be mitigated to less than significant levels.

6.9 Significant Irreversible Environmental Changes

The State CEQA Guidelines require that an EIR address any significant irreversible changes that would be caused by the implementation of a project. According to Section 15126.2(d), a project would result in significant irreversible changes if:

- The primary and secondary impacts would generally commit future generations to similar uses (such as highway improvement that provides access to a previously inaccessible area);

- The project would involve a large commitment of nonrenewable resources (CEQA Guidelines Section 15126.2(c));
- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project;
- The project would involve a large commitment of nonrenewable resources; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Implementation of the Project would result in the long-term commitment of resources of the Project site to urban land use. The development of the Project would likely result in or contribute to the following irreversible environmental changes:

- Conversion of approximately 304 acres of undeveloped land to urban uses, thus precluding other alternate land uses in the future.
- Irreversible consumption of energy and natural resources associated with the future use of the site.

Development of the Project would result in the commitment of approximately 304 acres to urban development, thereby precluding other uses for the lifespan of the Project. Restoration of the site to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment.

Resources that would be permanently and continually consumed by Project implementation include water, electricity, natural gas, and fossil fuels. Commitment of nonrenewable resources includes issues related to increased energy consumption. There would be an irretrievable commitment of labor, capital, and materials used during the construction and operation of the Project. Nonrenewable resources would primarily be committed in the form of fossil fuels such as fuel, oil, natural gas, and gasoline used by equipment associated with construction and operation of the Project. Consumption of other nonrenewable or slowly renewable resources would also occur. These resources would include lumber and other forest products, sand and gravel, asphalt, and metals such as steel, copper, and lead.
With respect to operational activities, compliance with all applicable state and local building codes, as well as mitigation measures, City of Hanford zoning regulations, and standard conservation features would ensure that resources are conserved to the maximum extent feasible. The Project would incorporate a number of sustainable practices that reduce the consumption of energy. Nonetheless, construction and operation of the Project would result in irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels, natural gas, and gasoline and diesel for automobiles and construction equipment.

The State CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by environmental accidents associated with the project. While

construction and operation of the Project would result in the use, transport, storage, and disposal of minor amounts of hazardous materials during project construction and operation as described in Section 4.10, Hazards and Hazardous Materials, all such activities would comply with applicable local, state, and federal laws related to the use, storage and transport of hazardous materials, which would significantly reduce the likelihood and severity of accidents that could result in irreversible environmental damage. The Project does include a gas dispensing facility, which is a hazardous waste generator. The GDF would require special handling or storage and will be compliant with the SJVAPCD Authority to Construct Permit, which will include additional analysis and measures to prevent impacts to nearby residents. Further, the HRA prepared for the Project demonstrated that the GDF will not exceed health risk thresholds established by the SJVAPCD and was deemed less than significant (See discussion in Section 4.10.4, Project Impacts).

The proposed Project would result in the long-term commitment of resources to urban development. The most notable significant irreversible impacts include the use of non-renewable and/or slowly renewable natural and energy resources, such as lumber and other forest products and water resources during construction activities. Operations associated with future uses would also consume water, natural gas, and electricity. These irreversible impacts, which are unavoidable consequences of urban growth, are described in detail in the appropriate sections of this Draft EIR (see Section 4).

6.10 Growth-Inducing Impacts

As stated in Section 15126.2(e) of the State CEQA Guidelines, an EIR must also discuss ways in which a proposed project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also, the EIR must discuss the characteristics of the project that could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, the stimulation of economic activity within the region, or the establishment of policies or other precedents that directly or indirectly encourage additional growth. Under CEQA, this growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth would be considered a significant impact if it can be demonstrated that the potential growth, directly or indirectly, significantly affects the environment.

These circumstances are described below.

- **Elimination of Obstacles to Growth:** This refers to the extent to which a proposed project removes infrastructure limitations or provides infrastructure capacity or removes regulatory constraints that could result in growth unforeseen at the time of project approval.

- **Economic Effects:** This refers to the extent to which a proposed project could cause increased activity in the local or regional economy. Economic effects can include such effects as the "multiplier effect." A "multiplier" is an economic term used to describe interrelationships among various sectors of the economy. The multiplier effect provides a quantitative description of the direct employment effect of a project, as well as indirect and induced employment growth. The multiplier effect acknowledges that the on-site employment and population growth of each project is not the complete picture of growth caused by the project.

6.10.1 Elimination of Obstacles to Growth

The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing effect, though not necessarily a significant one. A physical obstacle to growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines into areas that are not currently provided with these services would be expected to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth.

6.10.2 Removal of Infrastructure Limitations or Provision of Capacity

The proposed Project includes the construction of new water supply infrastructure, roadways, telecommunication facilities, electrical utility infrastructure, and a natural gas pipeline to service the Project site, consistent with the City's approved infrastructure master plans. (See Section 3, Project Description, for a more detailed description of proposed infrastructure improvements.) The new infrastructure improvements would extend through and connect to the City's existing infrastructure to the east and south of the Project site. The Project site is located within the City Limits and Sphere of Influence (SOI) of Hanford.

Existing development or areas planned for development are located to the east, west, and south of the Project site. Undeveloped land in the County is located to the north of the Project site, which could feasibly be developed in the future. However, this land is currently zoned and used for agricultural purposes. Development of infrastructure to accommodate the Project could be considered growth inducing because it would extend services into a previously undeveloped area. Additionally, improvements would be sized to serve the Project itself and future development of areas to the west of the Project site, should the area be developed in the future per the City of Hanford General Plan. Improvements may also be sized and located to serve existing residents to the east and south of the project site. Therefore, the Project would encourage future growth in these areas due to expansion of services and development of the Project site.

Development of the Project site, which would include fair-share payment for intersection improvements and other services to support development would not; however, enable land in the County to easily be developed. If, in the future development is proposed north of the Project site within the unincorporated County it would require annexation into the City, a general plan amendment, rezone, and environmental review under CEQA, as well as other permits and approvals prior to approval. The City has determined future growth can be accommodated within City or within its SOI, so it is not anticipated the City would expand their SOI to accommodate additional demand for growth in the foreseeable future.

6.10.3 Economic Effects

Temporary Construction Workforce: The proposed new buried utilities and new/extended roads would be built first. This work is expected to require up to 22 construction workers per workday. Once the infrastructure is complete, the homes will be built in seven phases, with the low-density homes being built first. The total construction of all phases of development is expected to take roughly 22 years. The building's construction is expected to require up to 35 workers per day per phase of development.

All construction workers are expected to be hired from within the City of Hanford, Community of Armona, City of Lemoore, or throughout the County of Kings to the extent practicable. Some of the workers originating outside this local area may temporarily be relocated to accommodations within Hanford for the duration of construction activities. Demand for temporary accommodations during construction is expected to be low and would be accommodated by existing lodging facilities in the region. There would not be permanent population growth from such temporary construction work and no expected indirect population growth from construction materials, restaurants, convenience stores, and/or other services that would serve the workers during Project construction, as existing facilities in the region would be adequate to accommodate the construction workforce.

Kings County has a construction labor force of 1,121 (U.S. Census, 2020). The City of Hanford alone has a construction labor force of 415. Additionally, the City of Lemoore has a construction labor force of 133 and the Community of Armona has a construction labor force of 57. The maximum of 35 construction workers hired from the community would represent approximately 8.4% percent of the total construction labor force in Hanford, and additional construction workers are also expected to come from the surrounding areas. The 35 construction workers hired would represent approximately 3 percent of the total construction labor force in the County. Since this is a temporary component of the Project, the construction phase would not trigger additional population growth in the area.

Population Increase from New Housing: The proposed Project includes constructing 1,146 new units of low, medium, and high-density residential development. As provided in Table 4-4 (Transportation), this is estimated to result in a population increase of 3,541 persons. Between 2010 and 2020, the population of Hanford grew approximately 7.5 percent, from 53,967 to 57,990

(U.S. Census, 2020). The County of Kings population decreased by approximately 0.3 percent, from 152,982 to 152,486. The Kings County Association of Governments (KCAG) growth forecast predicts a steady increase in population through 2060. From 2020 to 2060, KCAG estimates that the County of Kings will grow over 40 percent to approximately 215,000. The 2035 City of Hanford General Plan Projects a population of approximately 90,000 by the year 2035. The Projection is based on an annual growth rate of 2.1% and combines past growth rates in Hanford and proportional Projections estimated by the State Department of Finance for Kings County. The Project contribution of 3,541 persons, should they all come from outside the City of Hanford and result in direct migration, would account for a nominal amount of the expected population growth of the Community. Furthermore, substantial population growth is forecasted and planned for the County of Kings and the City of Hanford through 2060. Therefore, the proposed Project would not result in a substantial population increase outside of predicted growth and regional estimates within the County's General Plan. Implementation of the proposed Project is therefore not considered growth-inducing, but instead, growth-accommodating.

Local Employment: The future tenants of the commercial center are unknown, so the number of jobs that would be generated cannot be precisely determined. However, the Project would create new employment opportunities that could be filled by Project residents or non-Project residents in the vicinity of the site. In addition, the new housing and commercial uses would generate demand for such services as retail, landscaping, home cleaning, and maintenance which would contribute to the local economy. Additional local employment can be generated through the multiplier effect, as discussed previously in this section. The multiplier effect tends to be greater in regions with larger, diverse economies due to a decrease in the requirement to import goods and services from outside the region.

Two different types of additional employment are tracked through the multiplier effect. Indirect employment includes those additional jobs that are generated through the expenditure patterns of direct employment associated with the Project. Indirect jobs tend to be in relatively close proximity to the places of employment and residence. The multiplier effect also calculates induced employment. Induced employment follows the economic effect beyond the expenditures of the residents within the Project site to include jobs created by the stream of goods and services necessary to support residences within the proposed Project. When a manufacturer buys or sells products, the employment associated with those inputs or outputs are considered induced employment.

For example, when an employee of the Project goes out to lunch, the person who serves the employee lunch holds a job that is indirectly related to the proposed Project. When the server then goes out and spends money in the economy, the jobs generated by this third-tier effect are considered induced employment. The multiplier effect also considers the secondary effect of employee expenditures. Thus, it includes the economic effect of the dollars spent by those employees and residents who support the employees of the Project. Increased future employment generated by employee and resident spending ultimately results in physical development of space to accommodate those employees. It is the characteristics of this

physical space and its specific location that determine the type and magnitude of environmental impacts of this additional economic activity. Although the economic effect can be predicted, the actual environmental implications of this type of economic growth are too speculative to predict or evaluate, since they can be spread throughout the City, the County, and beyond.

6.11 Energy Conservation

To ensure that energy implications are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy (California Public Resources Code Section 21100[b][3]). Energy conservation implies that a project's cost-effectiveness be reviewed not only in dollars, but also in terms of energy requirements. For many projects, cost-effectiveness may be determined more by energy efficiency than by initial dollar costs. A lead agency may consider the extent to which an energy source serving a project has already undergone environmental review that adequately analyzed and mitigated the effects of energy production.

Consistent with California Public Resources Code Section 211009(b)(3), CEQA Guidelines Appendix G, and a ruling set forth by the court in California Clean Energy Committee v. City of Woodland, potentially significant energy implications of a project must be considered in an EIR to the extent relevant and appliable to that project. Accordingly, based on the energy consumption thresholds set forth in both Appendix F and Appendix G of the CEQA Guidelines, the Project's estimated energy demands (both short-term construction and long-term operational demands) were evaluated (see Appendix A2, Initial Study). The overall purpose of the energy analysis was to evaluate whether the Project would result in the wasteful, inefficient, or unnecessary consumption of energy.

Both Pacific Gas & Electric Company (PG&E) and Southern California Edison (SCE) provide electricity services to Hanford residents. The average energy usage is 1 kW per house. Additionally, SCE offers Green Rate Options, which allow consumers to indirectly purchase up to 100% 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.

SCE also provides energy conservation services from its Energy Savings Assistance Fund. The energy assistance fund helps those who qualify by income manage their electricity bills. This program primarily benefits low-income households, seniors, disabled, and non-English speaking residents. Another program, the Residential Multifamily Energy Efficiency Rebate Program, provides incentives for property owners to create energy-efficient improvements through lighting, HVAC, and insulation. SCE also offers several rebate programs, making energy-efficient kits available to residents at no cost.

As further assessed in the Initial Study (Appendix A2), compliance with California Title 24 energy efficiency requirements is considered demonstrable evidence of efficient use of energy. The Project would provide for and promote energy efficiencies beyond those required under other applicable federal and state standards and regulations, and in doing so would meet or exceed all Title 24 standards. On this basis, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy.

6.12 Impacts of Induced Growth

The growth induced directly and indirectly by the proposed Project could contribute to the environmental impacts, discussed in Section 4, in the City and the County, as well as the greater regional area. As discussed above, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on the required public service. An example of this indirect effect would be the expansion of water or wastewater infrastructure, which might allow for more development to be served by access to these services. The Project would not require the extension of any existing roadways but would require construction of on-site roads and perimeter improvements such as sidewalks, curbs, gutters, utilities and other infrastructure as well as fair-share contributions for intersection improvements for queuing impacts in the vicinity of the Project site. More specifically, implementation of the proposed Project would include the construction of new water supply and wastewater infrastructure, internal roadways, telecommunication facilities, electrical utility infrastructure, and natural gas pipelines to service the Project site. The new infrastructure improvements would extend through and connect to the City's existing infrastructure near the Project site. The proposed infrastructure improvements would be sized to serve the Project itself and to serve future development of areas to the north of the Project site, should the area be developed in the future per the City's General Plan. Improvements may also be sized and located to serve existing residents to the east of the project site. Development of the proposed Project site is identified as a planned improvement in the City's General Plan. Under CEQA, growth is not considered necessarily detrimental or beneficial.

Indirect and induced population growth in the City could further contribute to the loss of open space because it may encourage the conversion of undeveloped land to urban uses for additional housing and infrastructure. However, it is assumed this new growth would occur within areas of the City designated and zoned for development or planned for potential future urban development. Again, however, the particular open space that might get converted cannot be predicted with any certainty, all such conversions to urban land use would occur within areas planned for growth in the City's General Plan. Development of the property to the north is not currently proposed for future development by either the City or the County and are outside of the City's SOI, but the properties west of the Project site are also zoned for residential development and are within the City of Hanford SOI. However, as noted above, if previously unplanned development of the area north of the Project site is proposed in the future by the City, it would require an annexation into the City, a general plan amendment, rezone, and environmental review under CEQA prior to approval.

In summary, although the proposed Project can be said to induce growth, this growth in not unplanned. The proposed Project would develop a portion of the General Plan planned for residential development and any growth induced by the Project is consistent with that analyzed in the City's General Plan. No growth beyond what was already analyzed would occur and the City is not planning on extending its Urban Development Boundary. Furthermore, due to existing General Plan goals, policies and actions that support planned growth the proposed Project would not result in a significant growth inducing impact. Growth inducement, as it pertains to CEQA and this document, generally denotes growth that is not planned. Because the growth that would be induced by the Project was previously planned and analyzed, growth-inducing effects would be considered ***less than significant.***

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8 List of Preparers

List of Preparers

4-Creeks Inc.

- Molly Baumeister, AICP
- Kelsey George, Senior Planner
- Annamarie Wagner, Assistant Planner

Persons and Agencies Consulted

The following individuals and agencies contributed to this Environmental Impact Report:

City of Hanford

- John Doyel, Director of Public Works
- Gabrielle de Silva Myers, Senior Planner

LSA Associates

- Ambarish Mukherjee, P.E., AICP

Argonaut Ecological Consulting

- Kathy R. Kinsland, Owner, Senior Scientist

Peak and Associates

- Melinda A. Peak, Senior Historian/Archaeologist
- Michael Lawson, Archaeological Specialist

Technicon Engineering Services

- Lee Curra, Geologist
- Steve Curra, Environmental Engineering Division Manager

Core Environmental Consulting, Inc.

- Jesse Madsen