

Chapter 6 Alternatives

The alternatives analysis below meets the requirements of CEQA Guidelines Section 15126.6. This DEIR examines a range of reasonable alternatives to the Project that would feasibly attain similar objectives of the project while minimizing or eliminating impacts of the proposed Project. The CEQA Guidelines further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are addressed.

Among the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, and jurisdictional boundaries.

Analysis of the following three alternatives to the Fowler 2040 GP are provided for informational purposes and to allow the decision makers to consider the Fowler 2040 GP in light of hypothetical alternative development scenarios, thereby promoting CEQA’s purpose as an information disclosure statute. This analysis is guided by the following considerations set forth under CEQA Guidelines Section 15126.6:

- A DEIR need not consider every conceivable alternative to a project;
- A DEIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process;
- Reasons for rejecting an alternative include:
 - Failure to meet most of the basic project objectives;
 - Infeasibility; or
 - Inability to avoid significant environmental effects.

6.1 Project Objectives/Guiding Principles

Alternatives are compared to the GP based on an avoidance of environmental impacts and how closely they adhere to the vision statement is as follows:

The City of Fowler is a safe, affordable place to live with a small-town feel. Fowler’s community events and thriving schools create a place where you can raise your family and know your neighbors. Fowler fosters a dynamic business-friendly environment where shared goals and cooperation support local businesses and new economic investment. Thoughtful policies help conserve natural resources and provide well-maintained infrastructure to support responsible growth and development while preserving the unique, small-town identity that makes Fowler a great place to live, work, and play.

In accordance with CEQA Guidelines Section 15124, the following primary objectives were developed to support the project’s purpose, assist the lead agency in developing a reasonable range of alternatives to be evaluated in this DEIR, and ultimately aid decision-makers in preparing findings and overriding considerations, if necessary:

Protecting our Community’s Character. We celebrate Fowler’s unique small-town character and balance it with the need to foster growth both physically and economically. Our commitment to facilitating growth in a way that complements our character is reflected in core planning documents. Growth policies preserve our central commercial core, residential neighborhoods, and support local businesses that contribute to the fabric of our community.

Our Economy Thrives and Businesses Provide Local Amenities. We value and support businesses which bolster the community by providing jobs, services, goods, and recreational opportunities. Economic development focuses on supporting business expansion and diversification. Our small-town character is preserved while also providing jobs and increased local amenities, ensuring residents the opportunity to live, work, and recreate all in one place.

Growth Occurs Thoughtfully and is Shaped by our Community. A creative growth management strategy allows expansion to occur in a way that aligns economic needs, community vision, and regional goals. There is a strong system in place to guarantee that as the community accommodates new neighbors and new jobs, it continues to maintain and improve upon the lives of City residents, ensuring infrastructure and services successfully reach growth areas while continuing to serve established neighborhoods. New development is executed through land use decisions which involve careful research, coordination, and community outreach.

Our Community is Mobile and Connected. Our circulation system is complete, with amenities which make walking, biking, and transit use a safe, comfortable, and viable means of getting from place to place. Roadways are scaled appropriately for the types of land uses that surround them and provide access to jobs, services, goods, and recreational opportunities. The central commercial core is contiguous, with a well-maintained streetscape. Our circulation patterns are shaped by urban design principles which value street design as a method of community connection and placemaking.

Parks and Recreation are a Focal Point of our Community. Our parks and recreation facilities are safe, accessible, and connected to the community they serve. Passive and active recreation opportunities are abundant and coordinated across local facilities and organizations.

6.2 Development of Alternatives

Identifying land use alternatives began with research of existing plans, policies, and technical studies relevant to land use in Fowler. The research phase builds on previous deliverables, including the Fowler Background Report, policy papers on environmental justice and climate adaptation (located in [Appendix J](#)), and a policy review of the adopted GP.

The Project team, made up of City staff and consultants, then held stakeholder interviews (April 22, April 29, and April 30, 2019) which helped identify key issues, and hosted public workshops to share a new community vision, supporting principles, and identify planning priorities to be addressed during the updated process. Additional public workshops were held in 2019 (January 15, October 3, and November 5), in 2020 (August 18 and November 14), and 2021 (April 28 and July 1) to inform decision-makers of progress and key milestones in the process. Next steps included analyzing baseline conditions, establishing additional planning metrics and considerations, revising land use designations, and determining growth areas and areas of change. Once complete, these analyses facilitated the development of alternative land use plans.

The analysis of alternatives focuses on the various land use scenarios that incorporate different assumptions regarding the combinations of future land uses and associated infrastructure improvements. Alternatives provided are intended to reduce or avoid significant and unavoidable impacts. As discussed in [Chapter 4](#), the Project would have significant and unavoidable impacts related to Agriculture and Forestry Resources, Greenhouse Gas Emissions, and Air Quality. The following alternatives are evaluated in this DEIR:

- **Alternative 1:** No Project (2025 General Plan)
- **Alternative 2:** Existing Sphere of Influence

- **Alternative 3:** Primary Development Area Only
- **Alternative 4:** Full Buildout (Preferred Option)

Alternatives have been created to provide decision makers with a reasonable range of options to consider. Analyzing these options helps to demonstrate to decision makers and the general public the effects of revising components of the proposed Fowler 2040 GP. A summary description of the alternatives is provided below and summarized in [Table 6-1](#).

No Project Alternative

CEQA Section 15126.6(e) requires the discussion of the No Project Alternative “to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” The No Project Alternative in this case consists of not adopting the Fowler 2040 GP while continuing to utilize the City’s existing General Plan. Under this alternative, all land use changes and boundary changes will not occur and development will continue to be governed by the existing General Plan.

Existing SOI Alternative

The SOI Alternative considers the SOI from the City’s existing 2025 General Plan while making changes to the land uses to match those proposed under the Project. Namely, it removes the agricultural land designation from within the SOI and replaces it with various residential, commercial, industrial, and public facility designations which are more appropriate. Some other land use changes within the existing SOI are also retained in this alternative, including the conversion of some residential land to commercial uses and the redesignation of some land to public facilities land uses to better represent the existing use. This alternative includes the policy changes included in the Project.

The Existing SOI Alternative includes approximately 3,833 acres, 1,137 fewer than the Project. As such, all land uses except for Heavy Industrial also have fewer acres than the Project. Acreages for each land use can be seen in the table below. The 2,012 acres of residential land uses support a build-out of 10,833 dwelling units (which also includes 370 units from mixed-use commercial areas), 4,697 fewer than the Project. The Existing SOI Alternative accounts for approximately 21,281,377 square feet of commercial, industrial, and public facilities uses at build-out, which is expected to support approximately 23,325 employees. This is approximately 4,442,201 fewer square feet and approximately 7,553 fewer employees than the Full Fowler 2040 GP Buildout.

PDA Only Alternative

The PDA Alternative considers the proposed land uses in the PDA from the Project. This alternative recognizes the City’s desire to prioritize infill development in the PDA by excluding other areas from the Plan as well as to encourage industrial development along the Golden State Corridor. This alternative includes the policy changes included in the Project.

The PDA Alternative includes approximately 3,468 acres, 1,502 fewer than the Project. As such, all land uses except for Heavy Industrial and Parks and Open Space also have fewer acres than the Project. Acreages for each land use can be seen in the table below. The 1,380 acres of residential land uses support a build-out of 7,504 dwelling units (which also includes 361 units from mixed-use commercial areas), 8,026 fewer than the Project. The PDA Alternative accounts for approximately 24,875,892 square feet of commercial, industrial, and public facilities uses at build-out, which is expected to support approximately 29,296 employees. This is approximately 847,686 fewer square feet and approximately 1,582 fewer employees than the Full Fowler 2040 GP Buildout.

Full Fowler 2040 GP Buildout Alternative – Preferred Alternative

The Full Fowler 2040 GP Buildout is the subject of this DEIR and has thoroughly been evaluated in **Chapter 4**. It is the selected Project that would fulfil the vision of Fowler and satisfy the requirements of a growing community. The Full Fowler 2040 GP Buildout Alternative consists of developing the existing SOI and a potential expansion area includes the approximately 671 acres located beyond the existing SOI for the City of Fowler. This area has been included in the Planning Area as it represents land outside the existing City limits and SOI boundaries which in the City’s judgement bears relation to its planning efforts. The expansion area is comprised of two sections of land, located along the western boundary of the existing SOI.

The northern expansion area would expand the City’s potential for expansion west to Minnewawa and Kenneth Avenues, respectively. This expansion area would capture the State Route (SR) 99 and Clovis Avenue interchange in a more effective way than the current SOI boundary does.

Table 6-1: Comparative Summary of Fowler 2040 GP Alternatives

Alternative	Population	Employment	Residential Development (Dwelling Units)	Non-Residential Development (Square Feet)	Vehicle Miles Traveled (VMT)
No Project Alternative	10,571	8,792	3,223	7,579,319	247,894
Existing SOI Alternative	35,533	23,325	10,833	21,281,377	953,359
PDA Only Alternative	24,612	29,296	7,504	24,875,892	1,021,796
Full Fowler 2040 GP Buildout Alternative	48,404	30,102	15,718	25,822,662	1,240,395

Land use, population, and employment data were provided by email correspondence (Provost & Pritchard 2022) and VMT was included in the traffic report (Kittelsohn & Associates 2022).

6.3 Alternatives Evaluated in the DEIR

6.3.1 Alternative 1: “No Project” Alternative

Description

CEQA Guidelines Section 15126.6(e) requires a DEIR to evaluate a “No Project” Alternative, which is defined as what would be reasonably expected to occur in the foreseeable future if the project were not approved. Under this alternative, the 2025 GP would remain as the comprehensive planning document. Development would occur as allowed under the 2025 GP.

The “No Project” alternative assumes Fowler’s existing GP remains unchanged. There would be no new policies or programs in place that provide direction for issues regarding energy sustainability and climate resiliency, conservation of biological and mineral resources, protection of cultural and tribal resources, mitigation for hazardous materials, and wildfire management. Therefore, Fowler would not have in place any overarching policy guidance for how those issues will be addressed over the long term. There would also be no guidance for Fowler to manage inevitable growth or need for new housing and development.

The “No Project” Alternative includes approximately 3,939 acres, which is 1,031 acres less than the Project. The Project proposes a new land use designation, Medium High Residential, which is not included in the No Project alternative. The “No Project” Alternative also retains a land use that is not included in the Project, with 876 acres being designated for agricultural uses. All land uses in the “No Project” Alternative have fewer acres than the Project except for Agriculture, which is not included in the Project, and Heavy Industrial, which has the same acreage in both alternatives. Acreages for each land use can be seen in **Table 6-2** below.

Table 6-2: Comparison of the Project vs. “No Project” Alternative

Land Use Category	Total Acreages		Population		Dwelling Units	
	"No Project" Alternative	Proposed GP	"No Project" Alternative	Proposed GP	"No Project" Alternative	Proposed GP
Low Residential	258	790	2,435	7,461	742	2,275
Medium Low Residential	638	937	9,205	13,506	2,806	4,118
Medium Residential	326	733	6,920	15,935	2,110	4,858
Medium High Residential	0	203	0	7,886	0	2,404
High Residential	44	83	2,542	4,753	775	1,449
Residential Subtotal	1,266	2,746	21,102	49,540	6,434	15,104
Neighborhood Commercial	10	28	0	0	0	0
Community Commercial	60	104	682	1,397	208	426
General Commercial	146	210	0	0	0	0
Commercial Subtotal	215	342	682	1,397	208	426
Light Industrial	336	598	0	0	0	0
Heavy Industrial	1,105	1,105	0	0	0	0
Industrial Subtotal	1,441	1,703	0	0	0	0
Agriculture	876	0	0	0	0	0
Parks/Open Space	25	55	0	0	0	0
Public Facilities	117	123	0	0	0	0
Open Space Subtotal	1,018	178	0	0	0	0

The 1,266 acres of residential land uses support a build-out of 6,641 dwelling units (which also includes 208 units from mixed-use commercial areas), or 8,889 fewer than the Project. The No Project alternative accounts for approximately 21,137,978 square feet of commercial, industrial, and public facilities uses at build-out, which is expected to support approximately 23,110 employees. This is approximately 4,585,600 fewer square feet and approximately 7,768 fewer employees than the Project.

Impact Analysis

Aesthetics

Implementation of the “No Project” Alternative would involve less development and retain agricultural lands within the planning area, maintaining its heritage as a small-town, farming based community. The Project would increase the acreage of land under urban development and reduce the area of open space, parks, and agricultural land (See [Table 6-2](#)). The conversion and development of all agricultural land within the planning area under the Project would hinder many residents’ scenic views of a key aesthetic resource and replace those views with sights of new development and commercial buildings, while also eliminating an important land use that defines the aesthetic character of Fowler.

The “No Project” Alternative would have fewer benefits with respect to promoting high quality, compatible design and ensure the preservation of existing aesthetic character of the downtown area with its unique historic buildings. The Fowler 2040 GP includes goals, policies, and implementation measures that promote good design with new development, emphasize the visual quality of the public realm, and protect historic and cultural buildings that enhance Fowler’s charm.

Development under the Fowler 2040 GP would result in the potential for increased daytime glare from additional windows and reflective surfaces of buildings, as well as nighttime light associated with a higher number of dwelling units (See [Table 6-2](#)). However, as described in [Section 4.2](#), this increase would not be a substantial change from existing conditions and would result in similar impacts compared to the “No Project” Alternative.

Although the Project would implement standards, goals, and policies to minimize or avoid impacts to scenic views or historic buildings that give Fowler its charm, it would also promote conversion of all agricultural land within the planning area, which could impact aesthetic resources for some residents. Therefore, the “No Project” Alternative would potentially result in less impact to aesthetic resources compared to the Project.

Agriculture and Forestry Resources

As described in [Section 4.3](#), full buildout of the Project would result in a potentially significant impact to agriculture and forestry resources, converting a combined total of 3,674.12 acres of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural uses. The Project would also potentially cancel Williams Act contracts. There are no feasible mitigation measures that would minimize or avoid impacts and, at the same time, adhere to the circulation and development goals proposed by the Project.

Neither the “No Project” Alternative, nor the Project would conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. These zones are not found within the City or immediate vicinity.

Implementation of GP policies proposed by the Project would minimize the impact to an extent, but the conversion of agricultural land would have a significant and unavoidable impact to agricultural resources. The “No Project” Alternative would maintain existing land uses and result in lower impact to agricultural and forestry resources compared to the Project.

Air Quality

This alternative would result in the lowest amount of land use development and consequently the lowest amount of associated emissions. Implementation of the No Project Alternative would not result in development beyond what was evaluated in the currently adopted general plan. Therefore, there would be no impact associated with this alternative.

In comparison to full Fowler 2040 GP buildout and the alternatives evaluated, this alternative would result in the lowest amount of land use development. As shown in [Table 6-3](#), it would also result in the lowest amount of associated emissions. Implementation of this alternative would not result in development beyond what was evaluated in the currently adopted general plan. Therefore, full Fowler 2040 GP Buildout Alternative would result in increased adverse impacts related to emissions and air quality.

Table 6-3: Comparison of Operational Emissions Within Planning Area

Source	Emissions (tons/year) ¹				
	ROG	NO _x	CA	PM ₁₀	PM _{2.5}
No Project Alternative²					
Area ³	60.0	1.5	24.6	0.2	0.2
Energy ³	1.2	10.3	7.3	0.8	0.8
Mobile ⁴	24.0	68.4	200.8	3.7	1.9
Total:	85.2	80.2	232.7	4.7	2.9
Full Fowler 2040 GP Buildout Alternative					
Area ³	250.6	7.2	118.9	1.1	1.1
Energy ³	4.7	41.2	27.9	3.2	3.2
Mobile ⁴	43.1	114.7	359.5	14.6	5.5
Total:	298.4	163.1	506.3	18.9	9.8
Net Change Compared to No Project Alternative:	213.2	82.9	273.6	14.2	6.9
SJVAPCD Significance Thresholds⁵:	10	10	100	15	15
<p>1. Totals may not sum due to rounding.</p> <p>2. No Project Alternative based on existing Geral Plan land uses and year 2019 VMT provided.</p> <p>3. Emissions calculated using CalEEMod2020.4.0. Area source emissions are predominantly associated with the use of consumer products (e.g., cleaning supplies). Other area sources include landscape maintenance equipment, natural gas-fired appliances, and architectural coatings.</p> <p>4. Emissions calculated based on data derived from the VMT analysis prepared for this project and emission factors for Fresno County derived from EMFAC2021. Annual emissions of SOX associated with typical development are anticipated to be negligible and were not included.</p> <p>5. SJVAPCD Significance Thresholds apply to individual projects and are presented for informational purposes only. Refer to Appendix C for emissions modeling assumptions and results.</p>					

Biological Resources

As described in [Section 4.5](#), the planning area and surrounding lands are highly disturbed residential and agricultural areas and provide few resources and an inhospitable environment for special status species. Any species that may occur in these areas are typically adapted to anthropogenic disturbance and/or are ornamental species. The Fowler 2040 GP would involve greater urban development and expansion than the “No Project” Alternative, as well as conversion of agricultural land for non-agricultural uses. Neither scenario provides specific policies to protect special status species or their natural habitat. However, if special status species or protected habitat is known or observed, development under either scenario would be subject to CDFW or USFWS regulations.

The Fowler 2040 GP proposes the development of vacant or underdeveloped land and encourages growth of residential, commercial, and industrial areas. Implementation of the “No Project” Alternative would involve less overall development and associated growth than would occur under the Project. However, both the “No Project” Alternative and the GP provide goals and policies aimed to preserve street trees and the urban forest. Therefore, development occurring under the Project and the “No Project” Alternative would be subject to regulations regarding preservation of urban biological resources, ensuring that impacts under both scenarios would be reduced to less than significant.

Riparian area and natural communities of special concern are absent from the planning area. Therefore, there would be no impact to these biological resources as a result of either the Project or the “No Project” Alternative.

Designated federally protected waters, as defined by Section 404 of the Clean Water Act, are currently not present in the planning area. However, as described in [Section 4.5](#), National Wetland Inventory (NWI) indicates that potential wetlands are located within the planning area that may be categorized as waters of the United States or waters of the State. Activities involving impacts to state and/or federally protected waters are regulated by CDFW, USACE, and RWQCB. Therefore, activities would be regulated, and

mitigation measures would be provided by these agencies for activities under the Project and “No Project” Alternative that would avoid impacts of minimize them to a less than significant level.

As described in [Section 4.5](#), the planning area and surrounding lands are highly disturbed and provide few resources for special status species. Canals have the potential to facilitate movement, but are also highly disturbed and maintained within the planning area, making them inhospitable movement corridors. Therefore, it is unlikely that species would use the planning area for dispersal or migration. Development proposed under both the Project and “No Project” Alternative would therefore have a less than significant effect on wildlife movement.

There are no Habitat Conservation Plans or Natural Community Conservation Plans Applicable to the planning area. Therefore, both the “No Project” Alternative and Fowler 2040 GP would have no impact.

Cultural Resources

Implementation of “No Project” Alternative would involve less overall development and associated growth and would not include the expansion areas proposed under the Project. The “No Project” Alternative would involve infill development in vacant and underutilized parcels in already urbanized areas of Fowler, while the Project would expand into the surrounding agricultural areas, causing notably more ground disturbance. However, despite the greater level of potential ground disturbance under the Project, the enhanced goals and policies related to cultural and historic resources embedded within the Fowler 2040 GP ensure that overall impacts are less than significant. The “No Project” Alternative lacks any such protections. Therefore, Implementation of the “No Project” Alternative would potentially cause greater impacts to cultural and historical resources over the long term.

Similarly, the Project encourages renovation of the downtown area, and thus, may increase the desirability of redeveloping historic structures compared to the “No Project” Alternative. Compliance with the established regulatory framework proposed by the Project would ensure impacts are less than significant, compared to the “No Project” Alternative, which provides no such safeguards.

While development under the Project would be significantly greater than the “No Project” Alternative, activities under both scenarios would be required to adhere to existing State and federal regulations regarding the treatment of human remains. Therefore, impacts would be less than significant under the Project and the “No Project” Alternative.

Energy

Under the “No Project” Alternative overall predicted fuel and energy use associated would be lower than that generated by the other alternatives evaluated. However, when evaluated on a per capita basis, this alternative would result in higher fuel consumption than the other alternatives evaluated. Energy use on a per capita basis would be higher than that associated with the “Existing SOI” Alternative and the Project, yet slightly lower than that associated with the “PDA Alternative”. Implementation of this alternative would not result in development beyond what was evaluated in the currently adopted general plan. Therefore, there would be no impact associated with the “No Project” Alternative.

As shown in [Table 6-4](#) and [Table 6-5](#), overall predicted fuel and energy use associated with this alternative would be lower than that generated by the Full Fowler 2040 GP Buildout and the alternatives evaluated. However, when evaluated on a per capita basis, this alternative would result in higher fuel consumption than the other alternatives evaluated and the Full Fowler 2040 GP Buildout Alternative. Implementation of this alternative would not result in development beyond what was evaluated in the currently adopted general plan. Therefore, fewer adverse impacts from energy use would result from this Alternative than Full Fowler 2040 GP Buildout.

Table 6-4: Comparison of Operational Fuel Consumption

Source	Annual Fuel Use ¹ (gallons)	Annual MMBTU
No Project Alternative²		
On Road Vehicles (Diesel)	1,451,044	199,346
On Road Vehicles (Gasoline)	3,689,421	443,786
Total:		643,132
Estimated Population:		6,808
MMBTU/Capita:		94.5
Full Fowler 2040 GP Buildout Alternative		
On Road Vehicles (Diesel)	5,885,630	808,574
On Road Vehicles (Gasoline)	11,388,136	1,363,819
Total:		2,172,393
Estimated Population:		48,404
MMBTU/Capita:		44.9
<p><i>MMBTU = Million metric British thermal units</i></p> <p><i>1. Fuel use was calculated based, in part, on project trip generation rates derived from the traffic analysis prepared for this project (Kittelson & Associates 2022).</i></p> <p><i>2. No Project Alternative based on existing General Plan land uses and year 2019 VMT provided.</i></p> <p><i>3. Refer to Appendix C for modeling assumptions and results.</i></p>		

Table 6-5: Comparison of Operational Electricity and Natural Gas Consumption

Source	Annual Fuel Use ¹ (gallons)	Annual MMBTU
No Project Alternative²		
Electricity Consumption	52,309,627 kWh/year	178,480
Water Use, Treatment, and Conveyance	7,296,595 kWh/Year	24,896
Natural Gas Use	213,620,578 kBTU/Year	213,621
Total:		416,997
Estimated Population:		6,808
MMBTU/Capita:		61.3
Full Fowler 2040 GP Buildout Alternative		
Electricity Consumption	336,659,330 kWh/Year	1,148,682
Water Use, Treatment, and Conveyance	26,572,392 kWh/Year	90,665
Natural Gas Use	862,651,820 kBTU/Year	862,652
Total:		2,101,998
Estimated Population:		48,404
MMBTU/Capita:		43.4
<p><i>MMBTU = Million metric British thermal units</i></p> <p><i>1. Fuel use was calculated based, in part, on default construction schedules, equipment use, and vehicle trips identified for the operation of similar land uses contained in the CalEEMod output files prepared for the air quality analysis conducted for this project.</i></p> <p><i>2. No Project Alternative based on operational year 2019. Refer to Appendix C for modeling assumptions and results.</i></p>		

Geology and Soils

Due to the lack of any Alquist-Priolo Fault Zones, active faults, or potentially active faults within the planning area, neither the “No Project” Alternative nor Project would produce any impacts due to fault rupture.

Although the potential for liquefaction and landslides in Fowler are low due to the flat, level topography, the Project would incorporate existing regulatory standards within the CBC as well as seismic and geologic safety goals and policies in future construction and development, ensuring that any potential impact relating to seismic related ground failure, including liquefaction and landslides, is less than significant. The “No Project” Alternative lacks specific policies regarding seismic safety and may potentially have greater impacts during future seismic events.

Development involving soil disturbance is anticipated under the “No Project” Alternative and the Project, although substantially more would be involved under the Project due to increased development. Both scenarios would be required to comply with applicable local, state, and federal regulations, and implementation of BMPs under the NPDES permit, which requires the preparation of a SWPPP. In addition, goals and policies presented in the GP would provide more protections by upgrading and retrofitting structures that don’t meet building code standards. Therefore, while ground disturbance would be greater under the Project, potential soil erosion impacts, or the potential loss of topsoil, would be less than significant through compliance with applicable regulations.

Future development in Fowler under the “No Project” Alternative and the Project would be required to comply with building design and engineering standards within the CBC, which can require site-specific geotechnical studies to identify geologic and soil conditions, or soil sampling and treatment procedures for expansive soils, as well as other soil-related issues. Regulations within the CBC would ensure that impacts involving unstable or expansive soils are less than significant.

Potential soil impacts associated with use of septic tanks or alternative wastewater disposal systems would not occur because these structures would not be installed. Therefore, there would be no impact under the Project or the “No Project” Alternative.

The “No Project” Alternative would involve significantly less development and fewer dwelling units than the Project (See [Table 6-2](#)), which could result in less impacts involving damage to homes, businesses, utilities, or public service facilities in the event of strong seismic ground shaking. However, implementation of the Project would incorporate not only the existing regulations within the CBC, but also the goals and policies enforcing seismic and geologic safety standards in future construction and development, ensuring that impacts are less than significant.

Construction activities such as grading, excavation, and ground-disturbing activities may result in the accidental destruction or disturbance of paleontological sites. However, development on public lands, including lands owned by or under the jurisdiction of Fowler and/or public agencies would be subject to the provisions of PRC Sections 5097-5097.6, which prohibit the unauthorized disturbance or removal of paleontological resources. Any highway projects associated with implementation of the “No Project” Alternative would be subject to paleontological studies conducted by Caltrans and local project sponsors, and Section 305 of the Federal Highway Act of 1956 gives Caltrans authority to use federal funds to salvage paleontological sites affected by highway projects. The “No Project” Alternative does not contain any policies that specifically address the protection of paleontological resources, while the Project includes policies intended to expand protections for paleontological resources. Therefore, while development under the “No Project” Alternative may be less than significant due to State regulations, impacts under the Project are likely to be less than those that could occur under the “No Project” Alternative.

Greenhouse Gas Emissions

This alternative would result in the lowest amount of land use development. Based on the population estimates and the estimated community wide GHG emissions, estimated GHG emissions for this alternative would total approximately 11.9 MTCO_{2e}/Capita. Implementation of this alternative would not result in development beyond what was evaluated in the currently adopted general plan. Therefore, there would be no impact associated with this alternative. However, it is important to note that this alternative, when compared to the other alternatives evaluated, would result in the highest GHG emissions when evaluated on a per capita basis.

In comparison to Full Fowler 2040 GP Buildout and the alternatives evaluated, this alternative would result in the lowest amount of land use development. Based on the population estimates and the estimated

community wide GHG emissions noted in [Table 6-6](#), estimated GHG emissions for this alternative would total approximately 11.9 MTCO₂e/Capita. Implementation of this alternative would not result in development beyond what was evaluated in the currently adopted general plan. Therefore, there would be no impact associated with this alternative. However, it is important to note that this alternative, when compared to the other alternatives evaluated, would result in the highest GHG emissions when evaluated on a per capita basis. While GHG emissions would increase significantly, energy use would be more efficient per person with the Full Project Buildout.

Table 6-6: Comparison of Annual Operational GHG Emissions at Buildout

Source	Emissions (MTCO ₂ e)	
	No Project Alternative ⁴	Full Fowler 2040 GP Buildout
Area ^{1, 2}	1,445	7,045
Energy Use ²	19,522	50,203
Mobile ³	50,847	173,818
Waste ¹	5,933	23,143
Water ¹	3,415	9,478
Total ⁵ :	81,162	263,687
Population:	6,808	48,404
MTCO ₂ e/Capita:	11.9	5.4
Significance Threshold (MTCO₂e/Capita):	N/A	3.6
Full Fowler 2040 GP Buildout Alternative		
<ol style="list-style-type: none"> 1. Emissions were quantified using the CalEEMod computer program based on projected future development associated with implementation of the General Plan Update. 2. Hearth emissions were removed in order to comply with SJVAPCD rules. 3. Trip-generation rates derived from the traffic analysis prepared for this project and emissions were calculated using EMFAC data. 4. No Project Alternative based on existing General Plan land uses and year 2019 VMT provided. 5. Totals may not sum due to rounding. Refer to Appendix C for emissions modeling assumptions and results. 		

Hazards and Hazardous Materials

For both the Project and “No Project” Alternative, compliance with the regulations, standards, and guidelines established by the USEPA, the State of California, Fresno County, and Fowler would ensure that any impacts related to the transportation, use, accidental spills, improper handling and storage, and disposal of hazardous materials and wastes are less than significant. While increased growth and development would significantly expand the sources of hazardous materials and risk of adverse impacts under the Project, additional goals and policies proposed under the GP would direct Fowler to identify hazardous waste transportation routes, work cooperatively with other public agencies in emergency response, and update the Emergency Response Plan. These added protections would not apply under the “No Project” Alternative; therefore, impacts under the Project are anticipated to be lower under the Project.

The policies contained in the Project would provide a more comprehensive suite of emergency protections, including ensuring that the siting of critical emergency response facilities and communications facilities have minimal exposure to flooding, seismic and geologic effects, fire, and explosions. Thus, implementation of the Project may provide greater protection for critical emergency response facilities in the event of an emergency as compared to the “No Project” Alternative.

Neither the Project, nor the “No Project” Alternative would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Impacts from both scenarios would be the same. Further detail can be found in [Section 4.21](#).

Hydrology and Water Quality

Construction activities under the Project could result in the alteration of existing drainage patterns and soil erosion due to earth-moving and ground disturbance. The greater amount of acreage under development would increase the impacts compared to the “No Project” Alternative. However, conditions outlined within the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities Construction General Permit (Order No. 2012-0006-DWQ) would ensure impacts relating to water quality are less than significant for any particular project.

Changes in ground surface permeability from new paving, and changes in topography due to grading and excavation would be much more significant under the Project, but impacts from these changes would also be regulated by the NPDES General Permit. While the Project may have greater overall disturbance, policies and goals would be implemented to regulate water quality and stormwater management, and promote water use efficiency and conservation, keeping impacts at a less than significant level. The added protections would be absent in the “No Project” Alternative, potentially resulting in greater long-term impacts under this alternative.

Flooding hazards would be increased under the Project compared to the “No Project” Alternative due to increased development. Implementation of the new proposed policies and goals of the Project, in conjunction with State and federal regulations, would ensure that impacts would be less than significant. Existing regulations would be the only protection applied to the “No Project” Alternative, and growth under this alternative may have greater long-term impacts to flood risk.

Fowler is located in Central California and is therefore not located in a tsunami or seiche zone. The Project and “No Project” Alternative would have no impact.

Land Use and Planning

Neither the “No Project” Alternative nor Project would divide an established community. However, the Project contains a more comprehensive suite of policies that would facilitate the development and use of the bicycle, sidewalk, trail, and road networks within the planning area. Implementation of these policies would make it easier for residents to travel throughout the community, as compared to the No Project Alternative.

Under the Proposed Plan, the majority of the proposed land use changes would be from agriculture to non-agricultural uses; no existing housing is projected to be removed or replaced due to implementation of the Proposed Plan.

Any future development within Fowler would be required to be consistent within the Fowler’s Municipal Code, which would regulate intensity of allowed use and compatibility with surrounding uses. Although implementation of the “No Project” Alternative would involve less overall development and associated growth than would occur under the Project, polices and goals proposed by the GP would provide more protections and efficient land use under the Project.

Mineral Resources

Fowler does not contain any known mineral resources or mineral resource recovery sites delineated on a local general plan, specific plan, or other land use plan. The Project and the “No Project” Alternative would have no impact.

Noise

The “No Project” Alternative would result in the lowest amount of land use development. This alternative would also result in the lowest amount of VMT. Based on this information, the “No Project” Alternative would be expected to result in lower construction and operational noise and vibration levels, in comparison

to the other alternatives evaluated. Implementation of this alternative would not result in development beyond what was evaluated in the currently adopted general plan. Therefore, there would be no impact associated with this alternative.

Of the alternatives evaluated, this alternative would result in the lowest amount of land use development. This alternative would also result in the lowest amount of VMT. Based on this information, the No Project Alternative would be expected to result in lower construction and operational noise and vibration levels, in comparison to the Full Fowler 2040 GP Buildout and alternatives evaluated. Implementation of this alternative would not result in development beyond what was evaluated in the currently adopted general plan. Therefore, there would be lower adverse impacts relating to noise that are associated with this alternative, compared to Full Project Buildout.

Population and Housing

Implementation of the “No Project” Alternative would involve less development and growth compared to the Project. Buildout of the “No Project” Alternative would accommodate 20,604 people and 6,282 dwelling units, compared to the Project, which would accommodate a population of 48,131 and 14,764 dwelling units. The Project would result in population growth within the planning area through the construction of new homes, businesses, and the extension of utilities and infrastructure, and would implement a land use plan that would accommodate for a larger population, compared to the “No Project” Alternative. Historical annual growth rate of Fowler between two and three percent makes it unlikely that the actual buildout of the Fowler 2040 GP would exceed the planned buildout; therefore, replacement housing elsewhere would not be necessary and impacts to housing would be less than significant. Growth and development under the “No Project” Alternative would also be unlikely to reach potential buildout and would be able to accommodate the two to three percent growth without the displacement of housing and people.

Public Services

The growth in population and new development under the Project would increase the existing demand for fire protection services, police protection services, school facilities, and library facilities. To maintain or achieve acceptable service standards, new or physically altered fire, police, school, and library facilities would be required. When compared to the Project, the “No Project” Alternative would accommodate a lower population (21,784 people compared to 48,131 under the Project) which would create a greater demand for facilities to be constructed or expanded.

Goals and policies included in the Fowler 2040 GP would ensure that demands from population growth are met through provision of adequate staffing, infrastructure, utilities, and funding opportunities. These provisions are not included in the “No Project” Alternative, and population growth over the long term may not be supported by this option. Compared to the “No Project” Alternative, the Project would put more demand on public services, but would also provide ways to accommodate that demand. Therefore, impacts could be greater under the “No Project” Alternative.

Recreation

As discussed in [Section 4.17](#), the Project would accommodate the addition of approximately 41,526 residents to the planning area for a full buildout population of 48,131 persons by 2040, while the “No Project” Alternative would support 21,784 people. However, based on historic growth trends between two and three percent, the population growth anticipated under the Project would likely only be 8,364 – 11,833 people. Assuming growth trends will remain stable, an increase in the number of persons that utilize recreational facilities is anticipated under both the “No Project” Alternative and the Project, which would result in accelerated deterioration of the facilities and create a need for new or expanded recreational facilities.

In compliance with the Quimby Act, the Project includes goals and policies that would set a target parkland-to-population ratio and facilitate the addition and funding of new parks, facilities, open space, and trail facilities to accommodate a growing population and ensure access to all members of the community. Environmental impacts associated with new recreational facilities under the Project would be guided by the construction and development goals within the Fowler 2040 GP. Under the “No Project” Alternative, no policies exist which would facilitate compliance with the Quimby Act and expand recreational facilities. Therefore, impacts to recreation under the Project would be less than significant, while impacts under the “No Project” Alternative would increase and continue to be compounded.

Transportation

Buildout under the “No Project” Alternative would involve significantly less development and growth than the Project and contain 1,018 acres of open space and public facilities compared to 125 acres under the Project. Despite less growth under the “No Project” Alternative, the Project proposes significant improvement in transportation and circulation, and would result in lower VMT per capita and per employee than that measured in the reference year 2019. These VMT reductions included in the Project indicate that the future buildout scenario and development would allow Fowler residents and employees to access jobs and services within the city and within shorter distances compared to existing conditions. Without the additional policies and goals provided for in the 2040 General Plan, the “No Project” Alternative would result in an increase in VMT, similar or greater than the 2040 General Plan.

The existing GP has a Jobs-Housing ratio of 2.73,¹⁶⁷ which means that the existing GP has 2.73 jobs for every dwelling unit. While this imbalance implies that Fowler is jobs-rich, it also means that employees may live elsewhere and must commute farther. As the proposed Fowler General Plan would possess a Jobs-Housing ratio of 1.99, implementation of the “No Project” alternative would likely result in higher VMT per employee, and greater adverse impacts to transportation than the Project.

Tribal Cultural Resources

As discussed in [Section 4.19](#), tribal cultural resources impacts are highly dependent on both individual project site conditions and the characteristics of the proposed activity. Under the “No Project” Alternative, the existing land use designations in the 2025 GP would continue to define the type of development that occurs throughout Fowler, and agricultural land and open space would remain. Expansion of development and associated growth involved in the Project would have more potential to unearth tribal cultural resources as agricultural lands are converted into residential and commercial land uses. Therefore, tribal cultural resources impacts under the “No Project” Alternative would be less than that potentially found with the Project.

Similar to the Project, development under the “No Project” Alternative would be subject to laws and regulations requiring Native American consultation, protection of human remains, and pre-historic artifacts. Impacts would be less than significant with adherence to applicable laws and regulations.

Under both the “No Project” Alternative and the Project, a project-level CEQA document would need to identify potential impacts on known or potential historic sites and structures. New development would also be required to comply with PRC Section 5097.98, which addresses the disposition of Native American burials, protects remains, and appoints the NAHC to resolve disputes.

Utilities and Service Systems

Growth and development under the Project would be able to support a population of 48,131, compared to 21,784 under the “No Project” Alternative. This growth would generate additional demand for water and

¹⁶⁷ (Provost & Pritchard Consulting Group 2021)

wastewater services and, therefore, a potential increased demand for water provision and wastewater collection, conveyance, and treatment services over currently established levels. Additionally, this growth would increase demand for expansion of other utilities including electric power, natural gas, and telecommunication facilities. While the Project and associated population growth would result in a greater level of impact than the “No Project” Alternative due to higher demand for utilities, Fowler would implement the newest efficiency standards to limit adverse environmental impacts relating to increased infrastructure development and construction to a less than significant level. The “No Project” Alternative would involve existing growth under the 2025 GP, and impacts would be anticipated to result in less impact than the Project due to the smaller population, which would put less of a demand on utilities.

Implementation of the Project would result in an increase in the amount of influent required to be treated by the SKFCSD wastewater treatment facility due to the increase in population and would likely require expansion of wastewater facilities. The “No Project” Alternative would involve some population growth, but not to the extent of the Project. As higher levels of population growth occur under the Project, the likelihood of demand for higher capacity of wastewater treatment facilities increases, resulting in greater impacts to wastewater and treatment facilities compared to the “No Project” Alternative. Although the GP includes policies to reduce the impacts to wastewater to a less than significant level, the “No Project” Alternative would result in less of a demand and less impact than the Project.

Greater population growth under the Project would create increased amounts of solid waste compared to low growth under the “No Project” Alternative. Goals and policies within the GP address the potential effects to solid waste management, ensuring the impacts are less than significant.

The “No Project” Alternative would generate less demands upon utility and service systems than the proposed Project, given that this alternative involves less overall development and would support a smaller population.

Future development under the Project and the “No Project” Alternative would be required to comply with federal, State, and local statutes and regulations related to solid waste. Therefore, impacts under both the Project and the “No Project” Alternative would be the same.

Wildfire

As described in [Section 4.21](#), Fowler is not in or near a very high fire hazard severity zone or a SRA. Fowler does not have an adopted emergency response plan or emergency evacuation plan, but instead, falls under the Fresno County Master Emergency Services Plan, which mitigates for fire risk and guides emergency preparedness planning. Neither the Project, nor the “No Project” Alternative, would conflict with the County plan, resulting in a less than significant impact.

The urban and built-up setting of Fowler presents a low risk of wildfire due to environmental factors, including existing vegetation maintenance within and around Fowler. The Project proposes an expansion of residential area to 2,781 acres, while residential development under the “No Project” Alternative would support 1,266 acres.

Despite the expansion of development under the Project, which would require new infrastructure to protect against wildfire, future development under the Project or the “No Project” Alternative would be required to comply with the regulations and requirements of the CBC to maintain adequate safety measures regarding wildfire safety and preparedness. Therefore, any additional infrastructure under the Project that could exacerbate fire risk would be reduced to a less than significant level, and potential impacts involving wildfire under the Project and the “No Project” Alternative would be similar.

Fowler is not located on land that includes substantial slopes at risk of landslide that would put the public at increased risk of wildfire due to post-fire slope instability. The Project proposes goals and policies that

would increase awareness of wildfire and emergency preparedness, but due to the existing low-risk setting, similar wildfire related impacts would be anticipated under both scenarios, and would be less than significant.

6.3.2 Alternative 2: Existing Sphere of Influence

Description

The Existing SOI alternative considers the SOI from Fowler’s existing 2025 GP while making changes to the land uses to match those proposed under the Project. Namely, it removes the agricultural land designation from within the SOI and replaces it with various residential, commercial, industrial, and public facility designations which are more appropriate. Some other land use changes within the existing SOI are also retained in this alternative, including the conversion of some residential land to commercial uses and the redesignation of some land to public facilities land uses to better represent the existing use. This alternative includes the policy changes included in the Project.

The Existing SOI alternative includes approximately 3,833 acres, 1,137 fewer than the Project. As such, all land uses except for Heavy Industrial also have fewer acres than the Project. Acreages for each land use can be seen in the table below. The 2,012 acres of residential land uses support a build-out of 10,833 dwelling units (which also includes 370 units from mixed-use commercial areas), 4,697 fewer than the Project. The Existing SOI alternative accounts for approximately 21,281,377 square feet of commercial, industrial, and public facilities uses at build-out, which is expected to support approximately 23,325 employees. This is approximately 4,442,201 fewer square feet and approximately 7,553 fewer employees than the Project.

Table 6-7: Comparison of Project and Existing SOI Alternative

Land Use Category	Total Acreages		Population		Dwelling Units	
	Existing SOI	Proposed GP	Existing SOI	Proposed GP	Existing SOI	Proposed GP
Low Residential	524	790	4,948	7,461	1,508	2,275
Medium Low Residential	822	936	11,856	13,506	3,615	4,118
Medium Residential	515	750	10,940	15,935	3,335	4,858
Medium High Residential	98	223	3,469	7,886	1,057	2,404
High Residential	54	83	3,106	4,753	947	1,449
Residential Subtotal	2,012	2,781	34,318	49,540	10,463	15,104
Neighborhood Commercial	19	28	0	0	0	0
Community Commercial	106	122	1,214	1,397	370	426
General Commercial	131	210	0	0	0	0
Commercial Subtotal	256	360	1,214	1,397	370	426
Light Industrial	323	598	0	0	0	0

Land Use Category	Total Acreages		Population		Dwelling Units	
	Existing SOI	Proposed GP	Existing SOI	Proposed GP	Existing SOI	Proposed GP
Heavy Industrial	1,105	1,105	0	0	0	0
Industrial Subtotal	1,428	1,703	0	0	0	0
Agriculture	0	0	0	0	0	0
Parks/Open Space	6	2	0	0	0	0
Public Facilities	131	123	0	0	0	0
Open Space Subtotal	137	125	0	0	0	0
Total	3,833	4,970	35,533	50,937	10,833	15,530

Impact Analysis

Aesthetics

The Project would result in less than significant impacts to aesthetic resources with implementation of the proposed goals and policies (See [Section 4.1](#)). Compared to the Project, the “Existing SOI” Alternative would similarly involve increased residential and commercial development (See [Table 6-7](#)), specifically on the east side of SR 99, by converting a significant amount of open space and agricultural land. Agricultural land conversion and urban development within the SOI under this alternative would hinder many residents’ views of the Sierra Nevada Mountains and surrounding orchards and farms. Increased development under both the “Existing SOI” Alternative and the Project would potentially increase light, glare, and nighttime view impacts. While the number of dwelling units and acreage of urban development may differ under the “Existing SOI” Alternative and the Project, the proposed policies and goals related to aesthetic resources would ensure that any impacts are reduced to a less than significant impact. Therefore, the “Existing SOI” Alternative would result in similar impacts to aesthetic resources as the Project, and impacts would be less than significant.

Agriculture and Forestry Resources

As described in [Section 4.3](#), buildout of the Project would result in a potentially significant impact to Agriculture resources due to land conversion from agriculture to residential and commercial land uses. The “Existing SOI” Alternative would similarly convert Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural uses, and potentially convert a significant amount of Williamson Act land. There are currently no feasible mitigation measures which would minimize or avoid impacts to farmland or Williamson Act contracts, and at the same time, adhere to the circulation and development goals proposed by the Project.

Neither the “Existing SOI” Alternative, nor the Project would conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. These zones are not found within the City or immediate vicinity.

While the “Existing SOI” Alternative may not involve the level of proposed total residential development as the Project (2,012 acres versus 2,781 acres, respectively), or support as many dwelling units, both scenarios would result in potentially significant impacts to Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Williamson Act contracts. Under both scenarios, there would be zero acres of land dedicated to agricultural use. Implementation of GP policies, which would apply under the “Existing SOI” Alternative, would minimize the impact to an extent, but the conversion of agricultural land would have a

significant and unavoidable Impact to agricultural resources. Therefore, the “Existing SOI” Alternative and the Project would be similar in impact.

Air Quality

This Alternative would result in an increase in residential and non-residential development when compared to the No Project Alternative. In comparison to the Full Fowler 2040 GP Buildout Alternative, this alternative would result in a decrease in residential and non-residential development. In comparison to the Full Fowler 2040 GP Buildout Alternative, this decreased development would be expected to result in a proportionate decrease in construction and operational air quality emissions, as shown in **Table 6-8**. Proposed goals, policies, and mitigation measures identified in the air quality analysis prepared for the Full Fowler 2040 GP Buildout Alternative would also be recommended for this Alternative, which would reduce emissions. However, similar to the Full Fowler 2040 GP Buildout Alternative, details of future development projects are unknown at this time. Therefore, while this alternative would result in less development than the proposed Full Fowler 2040 GP Buildout Alternative, it may not be possible to reduce potential impact below acceptable thresholds. As a result, to be conservative, this alternative would be considered significant and unavoidable.

Table 6-8: Comparison of Operational Emissions Within Planning Area

Source	Emissions (tons/year) ¹				
	ROG	NO _x	CA	PM ₁₀	PM _{2.5}
Existing SOI Alternative					
Area ²	186.0	5.0	82.0	0.8	0.8
Energy ²	3.6	32.7	24.3	2.5	2.5
Mobile ³	24.0	68.4	200.8	3.7	1.9
Total:	85.2	80.2	232.7	4.7	2.9
Full Fowler 2040 GP Buildout Alternative					
Area ²	250.6	7.2	118.9	1.1	1.1
Energy ²	4.7	41.2	27.9	3.2	3.2
Mobile ³	43.1	114.7	359.5	14.6	5.5
Total:	298.4	163.1	506.3	18.9	9.8
Net Change Compared to No Project Alternative:	213.2	82.9	273.6	14.2	6.9
SJVAPCD Significance Thresholds⁴:	10	10	100	15	15
<p>1. Totals may not sum due to rounding.</p> <p>2. Emissions calculated using CalEEMod 2020.4.0. Area source emissions are predominantly associated with the use of consumer products (e.g., cleaning supplies). Other area sources include landscape maintenance equipment, natural gas-fired appliances, and architectural coatings.</p> <p>3. Emissions calculated based on data derived from the VMT analysis prepared for this project and emission factors for Fresno County derived from EMFAC2021. Annual emissions of SOX associated with typical development are anticipated to be negligible and were not included.</p> <p>4. SJVAPCD Significance Thresholds apply to individual projects and are presented for informational purposes only.</p>					

Biological Resources

As described in **Section 4.5**, the planning area and surrounding lands are highly disturbed residential and agricultural areas and provide few resources and an inhospitable environment for special status species. Any species that may occur in these areas are typically adapted to anthropogenic disturbance and/or are ornamental species. Both the Fowler 2040 GP and the “Existing SOI” Alternative would involve greater urban development and expansion, as well as conversion of agricultural land for non-agricultural uses. Impacts to special status species and habitat are not explicitly regulated under the goals and policies proposed in the Project. However, development under either scenario would be subject to regulation by CDFW or USFWS if State or federally protected biological resources had the potential to be impacted by Project-related activities. Therefore, the Project and the “Existing SOI” Alternative would be expected to result in less than significant impacts.

Both the Project and the “Existing SOI” Alternative proposes the development of vacant or underdeveloped land and encourages growth of residential, commercial, and industrial areas, which may involve impacts to urban biological resources including street trees. Both scenarios are subject to the same goals and policies aimed to preserve street trees and the urban forest, so impacts are expected to be similar and would be less than significant.

Riparian area and natural communities of special concern are absent from the planning area. Therefore, there would be no impact to these biological resources as a result of either the Project or the “Existing SOI” Alternative.

Designated federally protected waters, as defined by Section 404 of the Clean Water Act, are currently not present in the planning area. However, as described in [Section 4.5](#), NWI indicates that potential wetlands are located within the planning area that may be categorized as waters of the United States or waters of the State. Activities involving impacts to State and/or federally protected waters are regulated by CDFW, USACE and RWQCB. Therefore, activities under the Project and “Existing SOI” Alternative are required to comply with the mitigation measures provided by the applicable agencies, which would avoid impacts or ensure that they are less than significant.

As described in [Section 4.5](#), the Project would have less than significant impacts on wildlife movement corridors, which are nearly absent from the planning area. Land use conversion and development under the “Existing SOI” Alternative would be similar to that of the Project. Therefore, development proposed under both either scenario would have a less than significant effect on wildlife movement.

There are no Habitat Conservation Plans or Natural Community Conservation Plans Applicable to the planning area. Therefore, both the Project and “Existing SOI” Alternative would have no impact.

Cultural Resources

Implementation of the “Existing SOI” Alternative would involve a similar amount of expanded development and associated growth as full Project buildout. The “Existing SOI” Alternative and the Project would expand into the surrounding agricultural areas, causing significantly more ground disturbance and conversion of agricultural land into non-agricultural uses compared to the “No Project” Alternative. The enhanced goals and policies related to cultural and historic resources embedded within the GP would apply to both the Project and the “Existing SOI” Alternative and impacts would be less than significant.

Similarly, proposed goals and policies which would guide development under both the Project and the “Existing SOI” Alternative would encourage renovation of the downtown area, and thus, may increase the desirability of redeveloping historic structures. Compliance with the established regulatory framework would ensure that potential impacts from both scenarios are less than significant. Both scenarios would also be required to adhere to existing State and federal regulations regarding the treatment of human remains. Therefore, impacts would be less than significant under the Project and the “Existing SOI” Alternative.

Energy

The “Existing SOI” would result in lower overall fuel and energy use. However, when evaluated on a per capita basis, this alternative would result in lower fuel and energy use than the “PDA Alternative”, yet still higher than that associated with the Project. The proposed Fowler 2040 GP includes proposed goals and policies that would help to reduce energy impacts. The following of federal, State, and local standards would diminish any potential impacts. Therefore, it is expected that this alternative would similarly result in less than significant energy impacts.

This alternative would result in higher fuel and energy use than that associated with the Full Fowler 2040 GP Buildout Alternative. The proposed Fowler 2040 GP includes goals and policies that would help to reduce energy impacts. In addition, proposed mitigation measures identified in the energy analysis prepared for the Full Fowler 2040 GP Buildout Alternative would also be recommended for this alternative, which would further reduce energy consumption such that future development would not be anticipated to result in a wasteful use of energy. Therefore, it is expected that this alternative would similarly result in less than significant energy impacts.

Table 6-9: Comparison of Operational Fuel Consumption

Source	Annual Fuel Use ¹ (gallons)	Annual MMBTU
Existing SOI Alternative		
On Road Vehicles (Diesel)	4,523,654	621,464
On Road Vehicles (Gasoline)	8,714,413	1,048,222
Total:		1,669,686
Estimated Population:		35,533
MMBTU/Capita:		47.0
Full Fowler 2040 GP Buildout Alternative		
On Road Vehicles (Diesel)	5,885,630	808,574
On Road Vehicles (Gasoline)	11,388,136	1,363,819
Total:		2,172,393
Estimated Population:		48,404
MMBTU/Capita:		44.9
<i>MMBTU = Million metric British thermal units</i>		
<i>1. Fuel use was calculated based, in part, on project trip generation rates derived from the traffic analysis prepared for this project (Kittelson & Associates 2022).</i>		
<i>2. Refer to Appendix C for modeling assumptions and results.</i>		

Table 6-10: Comparison of Operational Electricity and Natural Gas Consumption

Source	Annual Fuel Use ¹ (gallons)	Annual MMBTU
Existing SOI Alternative		
Electricity Consumption	259,028,650 kWh/Year	883,806
Water Use, Treatment, and Conveyance	20,992,300 kWh/Year	71,626
Natural Gas Use	660,499,740 kBTU/Year	660,500
Total:		1,615,931
Estimated Population:		35,533
MMBTU/Capita:		45.5
Full Fowler 2040 GP Buildout Alternative		
Electricity Consumption	336,659,330 kWh/Year	1,148,682
Water Use, Treatment, and Conveyance	26,572,392 kWh/Year	90,665
Natural Gas Use	862,651,820 kBTU/Year	862,652
Total:		2,101,998
Estimated Population:		48,404
MMBTU/Capita:		43.4
<i>MMBTU = Million metric British thermal units</i>		
<i>1. Fuel use was calculated based, in part, on default construction schedules, equipment use, and vehicle trips identified for the operation of similar land uses contained in the CalEEMod output files prepared for the air quality analysis conducted for this project.</i>		
<i>2. Refer to Appendix C for modeling assumptions and results.</i>		

Geology and Soils

Due to the lack of any Alquist-Priolo Fault Zones, active faults, or potentially active faults within the planning area, neither the “Existing SOI” Alternative nor Project would produce any impacts due to fault rupture.

Although the potential for liquefaction and landslides in Fowler are low due to the flat, level topography, the “Existing SOI” Alternative and the Project would incorporate existing regulatory standards within the CBC, as well as seismic and geologic safety goals and policies in future construction and development, ensuring that any potential impact relating to seismic related ground failure, including liquefaction and landslides, are less than significant.

A comparable amount of development involving soil disturbance is anticipated under the “Existing SOI” Alternative and the Project. Both scenarios would be required to comply with applicable local, state, and federal regulations, and implementation of BMPs under the NPDES permit, which requires the preparation of a SWPPP. In addition, goals and policies presented in the GP would provide more protections under both scenarios by upgrading and retrofitting structures that don’t meet building code standards. Therefore, impacts involving soil erosion or the potential loss of topsoil under the “Existing SOI” Alternative and the Project would be less than significant level through compliance with applicable regulations.

Future development in Fowler under the “Existing SOI” Alternative and the Project would be required to comply with building design and engineering standards within the CBC, which can require site-specific geotechnical studies to identify geologic and soil conditions, or soil sampling and treatment procedures for expansive soils, as well as other soil-related issues. Therefore, impacts involving expansive or unstable soil are anticipated to be similar under either scenario.

Potential soil impacts associated with use of septic tanks or alternative wastewater disposal systems would not occur because these structures would not be installed. Therefore, there would be no impact under the Project or the “Existing SOI” Alternative.

The “Existing SOI” Alternative would involve expansion of development and new dwelling units, like the Project (See [Table 6-7](#)), which would be anticipated to result in similar impacts as the Project. Existing regulations within the CBC and also the goals and policies enforcing seismic and geologic safety standards in future construction and development would ensure that impacts under both scenarios are less than significant.

Construction activities such as grading, excavation, and ground-disturbing activities may result in the accidental destruction or disturbance of paleontological sites. However, the provisions of California Resources Code Sections 5097-5097.6, which prohibit the unauthorized disturbance or removal of paleontological resources would reduce adverse impacts to a less than significant level. Any highway projects associated with implementation of the “Existing SOI” Alternative and the Project would be subject to paleontological studies conducted by Caltrans and local Project sponsors, and Section 305 of the Federal Highway Act of 1956 gives Caltrans authority to use federal funds to salvage paleontological sites affected by highway projects. While development under the “Existing SOI” Alternative may be less than that of the Project, the goals and policies within the Fowler 2040 GP would ensure that adverse impacts are less than significant.

Greenhouse Gas Emissions

This alternative would result in an increase in residential and non-residential development when compared to the No Project Alternative. In comparison to the Full Fowler 2040 GP Buildout Alternative, this alternative would result in a decrease in residential and non-residential development. In comparison to the Full Fowler 2040 GP Buildout Alternative, this decreased development would be expected to result in a proportionate decrease in construction and operational GHG emissions, as shown in [Table 6-11](#). However, when evaluated on a per capita basis, this alternative would result in slightly higher GHG emissions when compared to the Full Fowler 2040 GP Buildout Alternative. Based on the population estimates and the estimated community wide GHG emissions, estimated emissions would total approximately 5.7

MTCO₂e/capita under this Alternative. Estimated GHG emissions would exceed the significance threshold of 3.6 MTCO₂e/capita. As a result, implementation of this alternative could result in a significant impact on the environment and conflict with the State’s GHG-reduction planning efforts. Proposed goals, policies, and mitigation measures identified in the air quality and GHG analysis prepared for the Full Fowler 2040 GP Buildout Alternative would also be recommended for this alternative, which would further reduce emissions. However, details of future development projects are unknown at this time. Therefore, it may not be possible to reduce potential impact below acceptable thresholds in all instances. As a result, to be conservative, GHG impacts would be considered significant and unavoidable.

Table 6-11: Comparison of Annual Operational GHG Emissions at Buildout

Source	Emissions (MTCO ₂ e)	
	Existing SOI Alternative	Full Fowler 2040 GP Buildout
Area ^{1, 2}	4,855	7,045
Energy Use ²	38,455	50,203
Mobile ³	133,595	173,818
Waste ¹	18,592	23,143
Water ¹	7,616	9,478
Total⁴:	203,113	263,687
Population:	35,533	48,404
MTCO ₂ e/Capita:	5.7	5.4
Significance Threshold (MTCO₂e/Capita):	3.6	3.6
<p><i>1. Emissions were quantified using the CalEEMod computer program based on projected future development associated with implementation of the General Plan Update.</i></p> <p><i>2. Hearth emissions were removed in order to comply with SJVAPCD rules.</i></p> <p><i>3. Trip-generation rates derived from the traffic analysis prepared for this project and emissions were calculated using EMFAC data.</i></p> <p><i>4. Totals may not sum due to rounding. Refer to Appendix C for emissions modeling assumptions and results.</i></p>		

Hazards and Hazardous Materials

For both the Project and “Existing SOI” Alternative, compliance with the regulations, standards, and guidelines established by the USEPA, the State of California, Fresno County, and Fowler would ensure that any impacts related to the transportation, use, accidental spills, improper handling and storage, and disposal of hazardous materials and wastes are less than significant. While increased growth and development would significantly expand the sources of hazardous materials and risk of adverse impacts under both Project and the “Existing SOI” Alternative, additional goals and policies proposed under the Fowler 2040 GP would direct Fowler to identify hazardous waste transportation routes, work cooperatively with other public agencies in emergency response, and update the Emergency Response Plan. These protections would apply to the Project and the “Existing SOI” Alternative, and therefore, impacts under both scenarios would be similar.

The policies contained in the Project would provide a more comprehensive suite of emergency protections, including ensuring that the siting of critical emergency response facilities and communications facilities have minimal exposure to flooding, seismic and geologic effects, fire, and explosions. Thus, implementation of the Project or the “Existing SOI” Alternative would have similar impacts for critical emergency response facilities in the event of an emergency.

Neither the Project, nor the “Existing SOI” Alternative would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Impacts from both scenarios would be the same. Further detail can be found in [Section 4.21](#).

Hydrology and Water Quality

Construction activities under the Project and the “Existing SOI” Alternative could result in the alteration of existing drainage patterns and soil erosion due to earth-moving and ground disturbance. The greater amount of acreage under development would increase the impacts under both scenarios, although the “Existing SOI” Alternative would involve a lower level of increase than the full Project and the expansion areas would cover slightly less are. Conditions outlined within the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities Construction General Permit (Order No. 2012-0006-DWQ) would ensure impacts relating to water quality are less than significant for any particular project. Impacts under the Project and the “Existing SOI” Alternative would be the same.

Changes in ground surface permeability from new paving, and changes in topography due to grading and excavation would occur under both the “Existing SOI” Alternative and the Project, but impacts from these changes would also be regulated by the NPDES General Permit. While the Project may have greater overall disturbance, policies and goals would be implemented to regulate water quality and stormwater management, and promote water use efficiency and conservation, and would ensure that impacts under the Project and “Existing SOI” Alternative are less than significant.

Flooding hazards would be increased under the Project and “Existing SOI” Alternative due to increased development. Implementation of the new proposed policies and goals, in conjunction with State and federal regulations, would ensure that impacts would be less than significant both options.

Fowler is located in Central California and is therefore not located in a tsunami or seiche zone. The Project and “No Project” Alternative would have no impact.

Land Use and Planning

Neither the “Existing SOI” Alternative nor Project would divide an established community. Implementation of policies that would facilitate the development and use of the bicycle, sidewalk, trail, and road networks within the planning area would make it easier for residents to travel throughout the community under both the Project and the “Existing SOI” Alternative. There would be similar impacts for both options.

Any future development within Fowler would be required to be consistent within Fowler’s Municipal Code, which would regulate intensity of allowed use and compatibility with surrounding uses. Although implementation of the “Existing SOI” Alternative would involve slightly less overall development and associated growth than would occur under the Project, polices and goals proposed by the GP would provide more protections and efficient land use which would ensure that impacts under both options are less than significant.

Mineral Resources

Fowler does not contain any known mineral resources or mineral resource recovery sites delineated on a local general plan, specific plan, or other land use plan. The Project and the “Existing SOI” Alternative would have no impact.

Noise

The “Existing SOI” Alternative would result in an increase in residential and non-residential development, as well as increases in VMT in comparison to the “No Project” Alternative. However, VMT associated with this alternative would be lower than that associated with the “PDA Only” Alternative and the Project. In comparison to the “PDA Only” Alternative and the Project this reduction in VMT would be anticipated to result in commensurable reductions in traffic noise levels on area roadways. As noted in the noise analysis prepared for the proposed Fowler 2040 GP, the proposed Fowler 2040 GP includes goals and policies that would reduce noise impacts. These same goals and policies, identified in the noise analysis prepared for the Project, would also be recommended for this alternative, which would further reduce noise exposure

to both non-transportation and transportation noise sources. Therefore, it is expected that this alternative would similarly result in less than significant noise impacts.

VMT associated with this alternative would be lower than that associated with the Full Fowler 2040 GP Buildout. In comparison to the Full Fowler 2040 GP Buildout Alternative, this reduction in VMT would be anticipated to result in commensurable reductions in traffic noise levels on area roadways. As noted in the noise analysis prepared for the proposed Fowler 2040 GP, the proposed Fowler 2040 GP includes goals and policies that would reduce noise impacts. These same goals and policies, as well as the proposed mitigation measures identified in the noise analysis prepared for the Full Fowler 2040 GP Buildout Alternative would also be recommended for this alternative, which would further reduce noise exposure to both non-transportation and transportation noise sources. Therefore, with mitigation, it is expected that this alternative would similarly result in less than significant noise impacts.

Population and Housing

As described in [Section 4.15](#), the Fowler 2040 GP impacts related to population and housing would be less than significant with the implementation of applicable regulations including General Plan policies and programs.

Implementation of the “Existing SOI” Alternative would involve less development and growth compared to the Project. Buildout of the “Existing SOI” Alternative would accommodate 35,533 people and 10,833 dwelling units, compared to the Project, which would accommodate a population of 48,131 and 14,764 dwelling units. The GP would result in population growth within the planning area through the construction of new homes, businesses, and the extension of utilities and infrastructure, and would implement a land use plan that would accommodate for a larger population under both the Project and the “Existing SOI” Alternative. Historical annual growth rate of Fowler between two and three percent makes it unlikely that the actual buildout of the Fowler 2040 GP would exceed the planned buildout, and therefore, replacement housing elsewhere would not be necessary and impacts to housing would be less than significant. Growth and development under the “Existing SOI” Alternative would also be unlikely to reach full potential buildout, and would be able to accommodate the two to three percent growth without the displacement of housing and people. Therefore, although development and population growth would be larger under the Project, both scenarios would be able to handle full projected growth. Impacts would be similar.

Public Services

The growth in population and new development under the Project and the “Existing SOI” Alternative would increase the existing demand for fire protection services, police protection services, school facilities, and library facilities. To maintain or achieve acceptable service standards, new or physically altered fire, police, school, and library facilities and services would be required. When compared to the Project, the “Existing SOI” Alternative would accommodate a lower population (35,533 people compared to 48,131 under the Project), but would still create a greater demand for facilities to be constructed or expanded.

Goals and policies included in the Fowler 2040 GP would ensure that demands from population growth are met through provision of adequate staffing, infrastructure, utilities, and funding opportunities. Population growth under both the Project and the “Existing SOI” Alternative would create more demand on public services, but would also provide ways to meet and mitigate for that demand. Therefore, impacts under either option would be the same.

Recreation

As discussed in [Section 4.17](#), the Project would result in a less than significant impact to recreational facilities by implementing goals and policies that would set a target parkland-to-population ratio and facilitate the addition and funding of new parks, facilities, open space, and trail facilities to accommodate

a growing population and ensure access to all members of the community. The “Existing SOI” Alternative would implement these same goals and policies, ensuring that any impacts are less than significant.

The Project and the “Existing SOI” Alternative may include environmental impacts associated with new recreational facilities, would be guided by the construction and development goals within the GP. Therefore, impacts to recreation under both the Project and the “Existing SOI” would be less than significant.

Transportation

As described in [Section 4.18](#), implementation of policies and goals within the Fowler 2040 GP would reduce any impacts to transportation to a less than significant level. The “Existing SOI” Alternative would also implement these policies and goals to ensure potential impacts are less than significant. The “Existing SOI” Alternative would entail fewer acres, a lower population, and fewer dwelling units, and would be expected to result in a commensurable reduction in trip generation and overall total vehicle miles traveled. However, the vehicle miles traveled per service population would be expected to marginally increase under this alternative because residents would be expected to travel outside of the City for some commercial and employment activity. Therefore, while still less than significant, the “Existing SOI” Alternative would result in slightly increased impacts related to transportation as compared to the General Plan.

Tribal Cultural Resources

The “Existing SOI” Alternative would involve the same land use patterns and facilitate development within the similar boundaries of the planning area as would be facilitated by the Project. Therefore, development under this alternative would result in similar impacts to tribal cultural resources as the Project because the potential to encounter resources during ground disturbance and construction activities would be similar.

Development under both this alternative and the Project would include the additional policies of the Fowler 2040 GP to protect tribal cultural resources and would comply with current laws and regulations requiring Native American consultation, and protection of human remains and pre-historic artifacts, which would ensure that any potential impacts are less than significant.

Utilities and Service Systems

Impacts under the “Existing SOI” Alternative related to wastewater treatment requirements, new water or wastewater treatment facilities, sufficient stormwater drainage facilities, adequate water supplies, adequate wastewater facilities, sufficient landfill capacity, solid waste regulations, and energy would be similar to those discussed for the Project but to a lesser degree because of the overall decrease in development. The “Existing SOI” Alternative would accommodate a lower population than the Project, but development and growth under this alternative would still create higher demand for water and wastewater services and, therefore, a potential increased demand for water provision and wastewater collection, conveyance, and treatment services over currently established levels.

The newest efficiency standards, goals and policies proposed in the GP, and compliance with federal, State, and local statutes and regulations related to solid waste would ensure that impacts to utilities and service systems are less than significant under both the Project and the “Existing SOI” Alternative.

Wildfire

As described in [Section 4.21](#), Fowler is not in or near a very high fire hazard severity zone or a SRA. Fowler does not have an adopted emergency response plan or emergency evacuation plan, but instead falls under the Fresno County Master Emergency Services Plan, which mitigates for fire risk and guides emergency preparedness planning. Neither the Project nor the “Existing SOI” Alternative would conflict with the County plan, resulting in a less than significant impact.

The urban and built-up setting of Fowler presents a low risk of wildfire due to environmental factors, including existing vegetation maintenance within and around Fowler. The Project and the “Existing SOI” Alternative propose similar expansion of residential area (2,781 acres vs. 2012 acres, respectively). Like the Project, the alternative would ensure potential impacts are less than significant with the implementation of applicable regulations including GP policies and programs, and future development would comply with the regulations and requirements of the CBC to maintain adequate safety measures regarding wildfire safety and preparedness. Therefore, any potential impacts that could exacerbate fire risk would be less than significant under both the Project and the “Existing SOI” Alternative.

Fowler is not located on land that includes substantial slopes at risk of landslide that would put the public at increased risk of wildfire due to post-fire slope instability. Therefore, impacts involving wildfire are expected to be similar under both scenarios and would be reduced to a less than significant level.

6.3.3 Alternative 3: Priority Development Area Only

Description

The Priority Development Area (PDA) Only alternative considers the proposed land uses in the PDA from the Project. This alternative recognizes Fowler’s desire to prioritize infill development in the PDA by excluding other areas from the Plan as well as to encourage industrial development along the Golden State Corridor. This alternative includes the policy changes included in the Project.

The “PDA Only” alternative includes approximately 3,468 acres, 1,502 fewer than the Project. As such, all land uses except for Heavy Industrial and Parks and Open Space also have fewer acres than the Project. Acreages for each land use can be seen in the table below. The 1,380 acres of residential land uses support a build-out of 7,504 dwelling units (which also includes 361 units from mixed-use commercial areas), 8,026 fewer than the Project. The PDA Only alternative accounts for approximately 24,875,892 square feet of commercial, industrial, and public facilities uses at build-out, which is expected to support approximately 29,296 employees. This is approximately 847,686 fewer square feet and approximately 1,582 fewer employees than the Project.

It was determined that this alternative did not meet certain project objectives, namely the objectives to provide for long-term economic and residential growth in Fowler and to provide increased services on the west side of SR 99.

Table 6-12: Comparison of Project and PDA Only Alternative

Land Use Category	Total Acreages		Population		Dwelling Units	
	PDA	Proposed GP	PDA	Proposed GP	PDA	Proposed GP
Low Residential	292	790	2,762	7,461	842	2,275
Medium Low Residential	667	936	9,621	135,06	2,933	4,118
Medium Residential	358	750	7,600	15,935	2,317	4,858
Medium High Residential	10	223	338	7,886	103	2,404
High Residential	54	83	3,106	4,753	947	1,449
Residential Subtotal	1,380	2,781	23,427	49,540	7,142	15,104
Neighborhood Commercial	10	28	0	0	0	0
Community Commercial	104	122	1,185	1,397	361	426

Land Use Category	Total Acreages		Population		Dwelling Units	
	PDA	Proposed GP	PDA	Proposed GP	PDA	Proposed GP
General Commercial	146	210	0	0	0	0
Commercial Subtotal	259	360	1,185	1,397	361	426
Light Industrial	598	598	0	0	0	0
Heavy Industrial	1,105	1,105	0	0	0	0
Industrial Subtotal	1,703	1,703	0	0	0	0
Agriculture	0	0	0	0	0	0
Parks/Open Space	2	2	0	0	0	0
Public Facilities	123	123	0	0	0	0
Open Space Subtotal	125	125	0	0	0	0
Total	3,468	4,970	24,612	50,937	7,504	15,530

Impact Analysis

Aesthetics

The Project would result in less than significant impact to aesthetic resources with implementation of the proposed goals and policies. Compared to the Project, the “PDA Only” Alternative would similarly involve increased residential and commercial development (See [Table 6-12](#)) by converting a significant amount of open space and agricultural land. Agricultural land conversion and urban development within the SOI under this alternative would hinder many residents’ views of the Sierra Nevada Mountains and surrounding orchards and farms. Increased development under both the “PDA Only” Alternative and the Project would potentially increase light, glare, and nighttime view impacts. While the number of dwelling units and acreage of urban development may differ under the “PDA Only” Alternative and the Project, the proposed policies and goals related to aesthetic resources would ensure that any impacts are less than significant. Therefore, the “Existing SOI” Alternative would result in similar impacts to aesthetic resources as the Project, and impacts would be less than significant .

Agriculture and Forestry Resources

As described in [Section 4.3](#), buildout of the Project would result in a potentially significant impact to Agriculture resources due to land conversion from agriculture to residential and commercial land uses. The “PDA Only” Alternative would similarly convert Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural uses, and potentially convert a significant amount of Williamson Act land. There are currently no feasible mitigation measures which would minimize or avoid impacts to farmland or Williamson Act contracts, and at the same time, adhere to the circulation and development goals proposed by the Project.

Neither the “PDA Only” Alternative, nor the Project would conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. These zones are not found within the City or immediate vicinity.

While the “PDA Only” Alternative may not involve the level of proposed total residential development as the Project (1,380 acres versus 2,781 acres, respectively), or support as many dwelling units, both scenarios would result in potentially significant impacts to Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Williamson Act contracts. Under both scenarios, there would be zero acres of land dedicated to agricultural use. Implementation of GP policies, which would also apply to the “PDA Only” Alternative, would minimize impacts to an extent, but the conversion of agricultural land would have a significant and unavoidable impact under both scenarios.

Air Quality

This Alternative would result in an increase in residential and non-residential development when compared to the No Project Alternative. In comparison to the Full Fowler 2040 GP Buildout Alternative, this alternative would result in a decrease in residential and non-residential development. In comparison to the Full Fowler 2040 GP Buildout Alternative, this decreased development would be expected to result in a proportionate decrease in construction and operational air quality emissions, as shown in [Table 6-13](#). Proposed goals, policies, and mitigation measures identified in the air quality analysis prepared for the Full Fowler 2040 GP Buildout Alternative would also be recommended for this alternative, which would reduce emissions. However, similar to the Full Fowler 2040 GP Buildout Alternative, details of future development projects are unknown at this time. Therefore, while this alternative would result in less emissions than the proposed Full Fowler 2040 GP Buildout Alternative, it may not be possible to reduce potential impact below acceptable thresholds. As a result, to be conservative, this alternative would be considered significant and unavoidable.

Table 6-13: Comparison of Operational Emissions within Planning Area

Source	Emissions (tons/year) ¹				
	ROG	NO _x	CA	PM ₁₀	PM _{2.5}
PDA Only Alternative					
Area ²	205.8	3.4	56.9	0.5	0.5
Energy ²	3.6	32.7	24.3	2.5	2.5
Mobile ³	35.5	94.5	296.1	12.0	4.5
Total:	244.9	130.6	377.3	15	7.5
Full Fowler 2040 GP Buildout Alternative					
Area ²	250.6	7.2	118.9	1.1	1.1
Energy ²	4.7	41.2	27.9	3.2	3.2
Mobile ³	43.1	114.7	359.5	14.6	5.5
Total:	298.4	163.1	506.3	18.9	9.8
Net Change Compared to No Project Alternative:	159.7	50.4	144.6	10.3	4.6
SJVAPCD Significance Thresholds⁴:	10	10	100	15	15
<p>1. Totals may not sum due to rounding.</p> <p>2. Emissions calculated using CalEEMod2020.4.0. Area source emissions are predominantly associated with the use of consumer products (e.g., cleaning supplies). Other area sources include landscape maintenance equipment, natural gas-fired appliances, and architectural coatings.</p> <p>3. Emissions calculated based on data derived from the VMT analysis prepared for this project and emission factors for Fresno County derived from EMFAC2021. Annual emissions of SOX associated with typical development are anticipated to be negligible and were not included.</p> <p>4. SJVAPCD Significance Thresholds apply to individual projects and are presented for informational purposes only. Refer to Appendix C for emissions modeling assumptions and results.</p>					

Biological Resources

As described in [Section 4.5](#), the planning area and surrounding lands are highly disturbed residential and agricultural areas and provide few resources and an inhospitable environment for special status species. Any species that may occur in these areas are typically adapted to anthropogenic disturbance and/or are ornamental species. Both the Fowler 2040 GP and the “PDA Only” Alternative would involve conversion of agricultural land and open space to non-agriculture uses as well as greater urban development. Impacts to special status species and habitat are not explicitly regulated under the goals and policies proposed in the Project. However, development under either scenario would be subject to regulation by CDFW or USFWS if State or federally protected biological resources had the potential to be impacted by Project-related activities. Therefore, the Project and the “PDA Only” Alternative would be expected to result in less than significant impact with the applicable agency permits.

Both the Project and the “PDA Only” Alternative proposes the development of vacant or underdeveloped land and encourages growth of residential, commercial, and industrial areas, which may involve impacts to

urban biological resources including street trees. Both scenarios are subject to the same goals and policies aimed to preserve street trees and the urban forest, so impacts are expected to be similar and would be less than significant.

Riparian area and natural communities of special concern are absent from the planning area. Therefore, there would be no impact to these biological resources as a result of either the Project or the “PDA Only” Alternative.

Designated federally protected waters, as defined by Section 404 of the Clean Water Act, are currently not present in the planning area. However, as described in [Section 4.5](#), NWI indicates that potential wetlands are located within the planning area that may be categorized as waters of the United States or waters of the State. Activities involving impacts to State and/or federally protected waters are regulated by CDFW, USACE, and RWQCB. Therefore, activities under the Project and “PDA Only” Alternative are required to comply with the mitigation measures provided by the applicable agencies, which would minimize or avoid impacts to a less than significant level.

As described in [Section 4.5](#), the Project would have less than significant impacts on wildlife movement corridors, which are nearly absent from the planning area. Land use conversion and development would occur at a lower intensity under the “PDA Only” Alternative, so impacts to biological resources and movement corridors are expected to be similar, if not less. Therefore, development proposed under either scenario would have a less than significant effect on wildlife movement.

There are no Habitat Conservation Plans or Natural Community Conservation Plans Applicable to the planning area. Therefore, both the Project and “Existing SOI” Alternative would have no impact.

Cultural Resources

Implementation of the “PDA Only” Alternative would involve a smaller increase of development and associated growth than the “Existing SOI” Alternative. The Project would expand into the surrounding agricultural areas, causing significantly more ground disturbance and conversion of agricultural land into non-agricultural uses compared to the Project. The enhanced goals and policies related to cultural and historic resources embedded within the GP would apply to both the Project and the “PDA Only” Alternative and ensure that any adverse impacts are less than significant.

Similarly, proposed goals and policies that would guide development under both the Project and the “PDA Only” Alternative would encourage renovation of the downtown area, and thus may increase the desirability of redeveloping historic structures. Compliance with the established regulatory framework would ensure that the potential impacts from both scenarios are less than significant. Both scenarios would also be required to adhere to existing State and federal regulations regarding the treatment of human remains. Therefore, impacts would be less than significant under the Project and the “PDA Only” Alternative.

Energy

This alternative would result in higher overall fuel and energy use than the other alternatives evaluated. Overall fuel and energy use would be lower than that associated with the Full Fowler 2040 GP Buildout Alternative. However, when evaluated on a per capita basis, this alternative would result in higher fuel and energy use than that associated with the Full Fowler 2040 GP Buildout Alternative. The proposed Fowler 2040 GP includes proposed goals and policies that would help to reduce energy impacts. In addition, proposed mitigation measures identified in the energy analysis prepared for the Full Fowler 2040 GP Buildout Alternative would also be recommended for this alternative, which would further reduce energy consumption such that future development would not be anticipated to result in a wasteful use of energy.

Therefore, it is expected that this alternative would similarly result in less than significant energy impacts than Full Fowler 2040 GP Buildout.

Table 6-14: Comparison of Operational Fuel Consumption

Source	Annual Fuel Use ¹ (gallons)	Annual MMBTU
Existing SOI Alternative		
On Road Vehicles (Diesel)	4,848,385	666,076
On Road Vehicles (Gasoline)	9,339,978	1,123,469
Total:		1,789,545
Estimated Population:		24,612
MMBTU/Capita:		72.7
Full Fowler 2040 GP Buildout Alternative		
On Road Vehicles (Diesel)	5,885,630	808,574
On Road Vehicles (Gasoline)	11,388,136	1,363,819
Total:		2,172,393
Estimated Population:		48,404
MMBTU/Capita:		44.9
<i>MMBTU = Million metric British thermal units</i>		
<i>1. Fuel use was calculated based, in part, on project trip generation rates derived from the traffic analysis prepared for this project (Kittelson & Associates 2022).</i>		
<i>2. Refer to Appendix C for modeling assumptions and results.</i>		

Table 6-15: Comparison of Operational Electricity and Natural Gas Consumption

Source	Annual Fuel Use ¹ (gallons)	Annual MMBTU
PDA Only Alternative		
Electricity Consumption	275,249,080 kWh/Year	939,150
Water Use, Treatment, and Conveyance	23,719,371 kWh/Year	80,930
Natural Gas Use	676,278,540 kBTU/Year	676,279
Total:		1,696,359
Estimated Population:		24,612
MMBTU/Capita:		68.9
Full Fowler 2040 GP Buildout Alternative		
Electricity Consumption	336,659,330 kWh/Year	1,148,682
Water Use, Treatment, and Conveyance	26,572,392 kWh/Year	90,665
Natural Gas Use	862,651,820 kBTU/Year	862,652
Total:		2,101,998
Estimated Population:		48,404
MMBTU/Capita:		43.4
<i>MMBTU = Million metric British thermal units</i>		
<i>1. Fuel use was calculated based, in part, on default construction schedules, equipment use, and vehicle trips identified for the operation of similar land uses contained in the CalEEMod output files prepared for the air quality analysis conducted for this project.</i>		
<i>2. Refer to Appendix C for modeling assumptions and results.</i>		

Geology and Soils

Like the Project, the “PDA Only” Alternative would not produce any impacts due to fault rupture and would have a very low potential for impacts due to seismic related ground failure, including liquefaction and landslides. Existing regulatory standards within the CBC, as well as seismic and geologic safety goals and policies in future construction and development, would ensure that any potential impact are less than significant under both the Project and the “PDA Only” Alternative.

Soil disturbance is anticipated under the “PDA Only” Alternative and the Project, although to a considerably less extent under the alternative. Both scenarios would be required to comply with applicable local, State,

and federal regulations, and implementation of BMPs under the NPDES permit, which requires the preparation of a SWPPP. In addition, goals and policies presented in the GP would provide more protections under both scenarios by upgrading and retrofitting structures that don't meet building code standards. Therefore, impacts involving soil erosion or the potential loss of topsoil under the "PDA Only" Alternative and the Project would be less than significant through compliance with applicable regulations.

Future development in Fowler under the "PDA Only" Alternative and the Project would be required to comply with building design and engineering standards within the CBC. Impacts involving expansive or unstable soil are anticipated to be less than significant under either scenario.

Potential soil impacts associated with use of septic tanks or alternative wastewater disposal systems would not occur because these structures would not be installed. Therefore, there would be no impact under the Project or the "PDA Only" Alternative.

Construction activities such as grading, excavation, and ground-disturbing activities may result in the accidental destruction or disturbance of paleontological sites under both the Project and the "PDA Only" Alternative, although the area of disturbance is considerably less under the alternative. Nevertheless, compliance with the goals and policies of the GP as well as existing federal, State, and/or local regulations would ensure that adverse impacts are less than significant.

Greenhouse Gas Emissions

This alternative would result in an increase in residential and non-residential development when compared to the No Project Alternative. In comparison to the Full Fowler 2040 GP Buildout Alternative, this alternative would result in a decrease in residential and non-residential development. In comparison to the Full Fowler 2040 GP Buildout Alternative, this decreased development would be expected to result in a proportionate decrease in construction and operational air quality emissions, as shown in [Table 6-16](#). However, when evaluated on a per capita basis, this alternative would result in higher GHG emissions than those associated with the Full Fowler 2040 GP Buildout Alternative. Based on the population estimates and the estimated community wide GHG emissions noted in [Table 6-16](#), estimated emissions would total approximately 8.7 MTCO₂e/Capita under this alternative. Estimated GHG emissions associated with this alternative would exceed the significance threshold of 3.6 MTCO₂e/capita. As a result, implementation of this alternative could result in a significant impact on the environment and conflict with the State's GHG-reduction planning efforts. Proposed goals, policies, and mitigation measures identified in the air quality and GHG analysis prepared for the Full Fowler 2040 GP Buildout Alternative would also be recommended for this alternative, which would reduce GHG emissions. However, details of future development projects are unknown at this time. Therefore, it may not be possible to reduce potential impact below acceptable thresholds in all instances. As a result, to be conservative, GHG impacts would be considered significant and unavoidable.

Table 6-16: Comparison of Annual Operational GHG Emissions at Buildout

Source	Emissions (MTCO ₂ e)	
	PDA Only Alternative	Full Fowler 2040 GP Buildout
Area ^{1, 2}	3,363	7,045
Energy Use ²	39,489	50,203
Mobile ³	143,185	173,818
Waste ¹	19,626	23,143
Water ¹	8,756	9,478
Total ⁴ :	214,419	263,687
Population:	24,612	48,404
MTCO ₂ e/Capita:	8.7	5.4
Significance Threshold (MTCO₂e/Capita):	3.6	3.6

Full Fowler 2040 GP Buildout Alternative

1. Emissions were quantified using the CalEEMod computer program based on projected future development associated with implementation of the General Plan Update.
2. Hearth emissions were removed in order to comply with SJVAPCD rules.
3. Trip-generation rates derived from the traffic analysis prepared for this project and emissions were calculated using EMFAC data.
4. Totals may not sum due to rounding.

Hazards and Hazardous Materials

For both the Project and “PDA Only” Alternative, compliance with the regulations, standards, and guidelines established by the USEPA, the State of California, Fresno County, and Fowler would ensure that any impacts related to the transportation, use, accidental spills, improper handling and storage, and disposal of hazardous materials and wastes are less than significant. While increased growth and development would significantly expand the sources of hazardous materials and risk of adverse impacts under the Project compared to the “PDA Only” Alternative, additional goals and policies proposed under the GP would apply to both scenarios and direct Fowler to identify hazardous waste transportation routes, work cooperatively with other public agencies in emergency response, and update the Emergency Response Plan. Therefore, impacts under both scenarios would be similar.

The policies contained in the Project would provide a more comprehensive suite of emergency protections, including ensuring that the siting of critical emergency response facilities and communications facilities have minimal exposure to flooding, seismic and geologic effects, fire, and explosions. Thus, implementation of the Project or the “PDA Only” Alternative would have similar impacts for critical emergency response facilities in the event of an emergency.

Neither the Project, nor the “PDA Only” Alternative would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Impacts from both scenarios would be the same. Further detail can be found in [Section 4.21](#).

Hydrology and Water Quality

Construction activities under the Project and the “PDA Only” Alternative could result in the alteration of existing drainage patterns and soil erosion due to earth-moving and ground disturbance. The greater amount of acreage under development would increase the impacts under both scenarios, although the “PDA Only” Alternative would involve a lower level of increase than the full Project and the expansion areas would cover slightly less are. Conditions outlined within the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities Construction General Permit (Order No. 2012-0006-DWQ) would ensure impacts relating to water quality are less than significant for any particular project. Impacts under the Project and the “PDA Only” Alternative would be the same.

Changes in ground surface permeability from new paving, and changes in topography due to grading and excavation would occur under both the “PDA Only” Alternative and the Project, but impacts from these changes would also be regulated by the NPDES General Permit. While the Project may have greater overall disturbance, policies and goals would be implemented to regulate water quality and stormwater management, and promote water use efficiency and conservation, and would ensure that impacts under the Project and “PDA Only” Alternative are less than significant.

Flooding hazards would be increased under the Project and “PDA Only” Alternative due to increased development. Implementation of the new proposed policies and goals, in conjunction with State and federal regulations, would ensure that impacts would be less than significant under both options.

Fowler is located in Central California and is therefore not located in a tsunami or seiche zone. The Project and “No Project” Alternative would have no impact

Land Use and Planning

Neither the “PDA Only” Alternative nor the Project would divide an established community. Implementation of policies that would facilitate the development and use of the bicycle, sidewalk, trail, and road networks within the planning area would make it easier for residents to travel throughout the community under both the Project and the “PDA Only” Alternative. There would be similar impacts for both options.

Any future development within Fowler would be required to be consistent within the Fowler’s Municipal Code, which would regulate intensity of allowed use and compatibility with surrounding uses. Although implementation of the “PDA Only” Alternative would involve less overall development and associated growth than would occur under the Project, policies and goals proposed by the GP would provide more protections and efficient land use which would ensure that impacts under both options are less than significant

Mineral Resources

Fowler does not contain any known mineral resources or mineral resource recovery sites delineated on a local general plan, specific plan, or other land use plan. The Project and the “PDA Only” Alternative would have no impact.

Noise

VMT associated with this alternative would be higher than that associated with the No Project Alternative, yet lower than that generated by the Full Fowler 2040 GP Buildout Alternative. In comparison to the No Project Alternative this increase in VMT would be anticipated to result in commensurable increases in traffic noise levels on area roadways. In comparison to the Full Fowler 2040 GP Buildout Alternative, this alternative would be anticipated to result in lower overall traffic noise levels. As noted in the noise analysis prepared for the proposed Fowler 2040 GP, the proposed Fowler 2040 GP includes goals and policies that would reduce noise impacts. These same goals and policies, as well as the proposed mitigation measures identified in the noise analysis prepared for the Full Fowler 2040 GP Buildout Alternative would also be recommended for this alternative, which would further reduce noise exposure to both non-transportation and transportation noise sources. Therefore, with mitigation, it is expected that this alternative would similarly result in less than significant noise impacts.

Population and Housing

As described in [Section 4.15](#), the Fowler 2040 GP’s impacts related to population and housing would be less than significant with the implementation of applicable regulations including GP policies and programs.

Implementation of the “PDA Only” Alternative would involve less development and growth compared to the Project. Buildout of the “PDA Only” Alternative would accommodate 24,612 people and 7,504 dwelling units, compared to the Project, which would accommodate a population of 48,131 and 14,764 dwelling units. The Fowler 2040 GP would result in population growth within the planning area through the construction of new homes, businesses, and the extension of utilities and infrastructure, and would implement a land use plan that would accommodate for a larger population under both the Project and the “PDA Only” Alternative. Historical annual growth rate of Fowler between two and three percent makes it unlikely that the actual buildout of the Fowler 2040 GP would exceed the planned buildout; therefore, replacement housing elsewhere would not be necessary and impacts to housing would be less than significant. Growth and development under the “PDA Only” Alternative would also be unlikely to reach full potential buildout, and would be able to accommodate the two to three percent growth without the displacement of housing and people. Therefore, although development and population growth would be larger under the Project, both scenarios would be able to handle full projected growth. Impacts would be similar.

Public Services

The growth in population and new development under the Project and the “PDA Only” Alternative would increase the existing demand for fire protection services, police protection services, school facilities, and library facilities. To maintain or achieve acceptable service standards, new or physically altered fire, police, school, and library facilities and services would be required. When compared to the Project, the “Existing PDA Only” Alternative would accommodate a lower population (24,612 people compared to 48,131 under the Project), but would still create a greater demand for facilities to be constructed or expanded.

Goals and policies included in the Fowler 2040 GP would ensure that demands from population growth are met through provision of adequate staffing, infrastructure, utilities, and funding opportunities. Population growth under both the Project and the “PDA Only” Alternative would create more demand on public services, but would also provide ways to accommodate that demand. Therefore, impacts under either option would be the same.

Recreation

As discussed in [Section 4.17](#), the Project would result in a less than significant impact to recreational facilities by implementing goals and policies that would set a target parkland-to-population ratio and facilitate the addition and funding of new parks, facilities, open space, and trail facilities to accommodate a growing population and ensure access to all members of the community. The “PDA Only” Alternative, following the same goals and policies, would likely accommodate a smaller population and require a lower area of parkland. However, potential impacts to recreation under either scenario would be less than significant, avoiding deterioration to existing facilities by ensuring space and funding for new development.

The Project and the “PDA Only” Alternative may include environmental impacts associated with development and construction of new recreational facilities, which would be guided by goals and policies within the GP. Compliance with the applicable mitigation measures in the Fowler 2040 GP would ensure that impacts to recreation under both the Project and the “PDA Only” are less than significant.

Transportation

The Fowler 2040 GP would result in a less than significant impact to transportation with the implementation of goals and policies to improve access and circulation, as well as other transportation related issues. The “PDA Only” Alternative would result in a jobs to housing ratio of 3.9. While this imbalance implies that Fowler would become even more jobs-rich, it also means that employees would drive even further distances to access employment and other services. As the proposed Fowler General Plan would possess a Jobs-Housing ratio of 1.99, implementation of this alternative would result in higher VMT per employee.

While the policies implemented in the Fowler 2040 GP would reduce any impact to less than significant, this alternative would have slightly higher adverse impacts to transportation compared to the Project.

Tribal Cultural Resources

The “PDA Only” Alternative would involve less development and expansion than the Project and would prioritize infill development rather than new ground disturbance. However, this alternative would follow the same land use patterns within similar boundaries of the planning area as would be facilitated by the Project. Therefore, while development under this alternative could potentially result in fewer impacts to tribal cultural resources than the Project, the potential to encounter resources during ground disturbance and construction activities would be similar, and the goals and policies proposed by the Project would ensure that any potential impacts are less than significant.

Development under both this alternative and the Project would also be required to comply with current laws and regulations requiring Native American consultation, and protection of human remains and pre-historic artifacts, which would reduce potential impacts to a less than significant level with mitigation incorporated. Thus, this alternative and the Project would have similar impact on tribal cultural resources, despite the difference in project size.

Utilities and Service Systems

Impacts under the “PDA Only” Alternative related to wastewater treatment requirements, new water or wastewater treatment facilities, sufficient stormwater drainage facilities, adequate water supplies, adequate wastewater facilities, sufficient landfill capacity, solid waste regulations, and energy would be similar to those discussed for the Project but to a lesser degree because of the overall decrease in development. The “PDA Only” Alternative would accommodate a lower population than the Project, but development and growth under this alternative would still create higher demand for water and wastewater services and, therefore, a potential increased demand for water provision and wastewater collection, conveyance, and treatment services over currently established levels.

The newest efficiency standards, goals and policies proposed in the GP, and compliance with federal, State, and local statutes and regulations related to solid waste would ensure that impacts to utilities and service systems are less than significant under both the Project and the “Existing SOI” Alternative.

Wildfire

As described in [Section 4.21](#), Fowler is not in or near a very high fire hazard severity zone or a SRA. Fowler does not have an adopted emergency response plan or emergency evacuation plan, but instead falls under the Fresno County Master Emergency Services Plan, which mitigates for fire risk and guides emergency preparedness planning. Neither the Project, nor the “PDA Only” Alternative, would conflict with the County plan, resulting in a less than significant impact.

Fowler provides an urban and built-up setting that would present a low risk of wildfire due to environmental factors, including existing vegetation maintenance within and around Fowler. Future development under the Project or the “PDA Only” Alternative would be required to comply with the regulations and requirements of the CBC to maintain adequate safety measures regarding wildfire safety and preparedness. Therefore, any potential impacts that could exacerbate fire risk would be less than significant under both the Project and the “No Project” Alternative.

Furthermore, Fowler is not located on land that includes substantial slopes at risk of landslide that would put the public at increased risk of wildfire due to post-fire slope instability. The Project proposes goals and policies that would increase awareness of wildfire and emergency preparedness, but due to the existing low-risk setting, similar wildfire related impacts would be anticipated under both scenarios, and would be less than significant under both scenarios.

6.4 Significant and Unavoidable Project Impacts

The Fowler 2040 GP was analyzed for potentially significant impacts related to each of the environmental topic areas discussed in [Chapter 4](#). The results of the analysis demonstrate that the General Plan would result in significant and unavoidable impacts to Greenhouse Gas Emissions, Agriculture and Forestry Resources, and Air Quality.

6.5 Alternatives Considered but Rejected

It was determined that the “No Project” alternative did not meet certain Fowler 2040 GP goals and objectives. The unchanged land use plan does not provide for the growth of Fowler to meet its long-term residential and commercial needs, nor does it account for the increase service needs on the west side of SR 99. Furthermore, the existing policies do not address new policy topics identified in the objectives, including vehicles miles traveled.

Notably absent from the selected alternatives is an alternative project site. CEQA Guidelines Section 15126.6(f)(2) specifically addresses the requirements for consideration of alternate locations. The CEQA Guidelines specifically note that there may be no feasible alternative locations for some types of projects, such as a project that is governed by the location of natural resources critical to the project. Due to the programmatic and citywide nature of the GP, it is not feasible to evaluate an alternative project site. The General Plan does not identify any site-specific projects; rather, it designates broad areas for certain types of residential, commercial, and other development via land use designations. By definition, the Fowler 2040 GP must govern development within Fowler, so alternative locations are not applicable.

6.6 Environmentally Superior Alternative

According to State CEQA Guidelines Section 15126.6(e), “if the environmentally superior alternative is the No Project Alternative, the DEIR shall also identify an environmentally superior alternative among the other alternatives.” [Table 6-17](#) summarizes the comparative analyses presented above (i.e., the alternatives compared to the proposed Project). As shown in [Table 6-17](#), the Priority Development Area Only Alternative is the environmentally superior alternative because it would reduce many of the Project’s impacts. Therefore, in compliance with CEQA requirements, this DEIR also identifies an environmentally superior alternative among the other alternatives.

Table 6-17: Comparison of Project Alternative Impacts

Resource Areas	Alternative 1: No Project	Alternative 2: Existing SOI	Alternative 3: PDA Only
Aesthetics	∨	=	=
Agriculture and Forestry Resources	∨	=	=
Air Quality	∨	∧	∧
Biological Resources	∨	=	=
Cultural Resources	∨	=	=
Energy	∨	=	=
Geology and Soils	∧	=	=
Greenhouse Gas Emissions	∨	∧	∧
Hazards and Hazardous Materials	∧	=	=
Hydrology and Water Quality	∧	=	∨
Land Use and Planning	∧	=	=
Mineral Resources	=	=	=
Noise	∨	=	=
Population and Housing	=	∧	∧

Resource Areas	Alternative 1: No Project	Alternative 2: Existing SOI	Alternative 3: PDA Only
Public Services	∨	=	=
Recreation	^	=	=
Transportation	^	=	^
Tribal Cultural Resources	∨	=	=
Utilities and Service Systems	∨	=	∨
Wildfire	=	=	=
^ Indicates an impact that is greater than the proposed project (environmentally inferior). ∨ Indicates an impact that is less than the proposed project (environmentally superior). = Indicates an impact that is equal to the proposed project (neither environmentally superior nor inferior)			