March 1, 2023

Elliot Racusin, Planner, Department of Public Works and Planning
Development Services and Capital Projects, Fresno County
2220 Tulare St., 6th Floor
Fresno, CA 93721

RE: PRELIMINARY ENVIRONMENTAL REVIEW NO. 8341 AND UNCLASSIFIED CONDITIONAL USE PERMIT APPLICATION NOS. 3555

Traffic Operations and Planning staff has reviewed the Unclassified Conditional Use Permit Application No. 3755 & Preliminary Environmental Review No. 8341 to extend the operational time limit for the CEMEX Plant and Quarry Sites (project) on Friant Road in the County of Fresno. The extension would be from July 28, 2023 to July 28, 2027. The Beck Ranch Sand and Gravel Permit CU 2235, EA 3157 Draft Environmental Impact Report (EIR) was also provided as part of the application and used for the environmental assessment.

The City has determined that the existing EIR is no longer adequate for the proposed project because substantial changes have occurred with respect to the circumstances under which the project is undertaken. These changes will require major revisions of the previous EIR. While the City has requested an additional two weeks to provide additional comments, our initial cursory review has identified the following:

1. The current application does not appear to be consistent with the project operations description included in the July 1986 EIR. In the 1986 EIR, a total of 272 trips have been identified, including 260 truck trips and 12 automobile trips. The current application has identified the existing trip generation for the Project to be 690 truck trips and 110 employee trips.

2. The 1986 EIR used a cumulative year of 2006 for traffic volumes and identified an annual daily traffic (ADT) volume of 9,770 on Friant Road, south of Willow Avenue.
Count data collected by the City of Fresno in 2021 shows an ADT volumes of approximately 64,500 along Friant Road, north of Audubon Drive. The ADT north of Champlain Drive was approximately 22,000 in 2019.

3. The 1986 EIR fails to analyze the impact of traffic generated by the Project on facilities within the City of Fresno.

4. Pedestrian and bicyclist volumes along the Friant Road corridor have increased due to Woodward Park and the trail facilities in the area. The increased volumes of pedestrian and bicyclists increases the probability of serious and/or fatal collisions with pedestrians and bicyclists. There have been multiple pedestrian and bicyclist fatalities along Friant Road in the last five (5) years. The increase in pedestrian and bicyclist volumes is new information not available and/or not addressed in the 1986 EIR.

If you have any further questions regarding this matter, please contact Jennifer Clark at (559) 621-8003 or jennifer.clark@fresno.gov or Jill Gormley at (559) 621-8792 or jill.gormley@fresno.gov.

Sincerely,

Jennifer Clark

Cc: Georgeanne White, City Manager
    Scott Mozier, Director, Public Works
    Jill Gormley, Traffic Operations & Planning Manager
    Kristi Costa, Senior Deputy City Attorney
Based upon your review of the attached project information, please address the following questions and information.

(Check one)

1. ____ The proposed project is within the scope of the existing EIR. The project will have no additional significant environmental effects and no new mitigation measures are required.

2. __ Check one event as specified in the Environmental Quality Act Section 15162 have occurred:

   (a) ____ Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

   (b) __ Check one event as specified in the Environmental Quality Act Section 15162 have occurred:

   (c) ____ New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

   - The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

   - Significant effects previously examined will be substantially more severe than shown in the previous EIR;

   - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative;

   - Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Check here if you need a copy of the environmental determination ___.

Signature ______________________ Agency ______________________
Date 3/1/2023 Phone 559-621-8001

Please provide your project comments (not related to the EIR) on a separate sheet of paper.