SAN JOAQUIN LOCAL AGENCY FORMATION COMMISSION

RECOMMENDATIONS FOR RESPONSIBLE AGENCY ACTION PURSUANT TO CEQA GUIDELINES SECTION 15096

FOR THE

ARCHTOWN INDUSTRIAL PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
ADOPTED BY THE CITY OF STOCKTON
NOVEMBER 15, 2011
CITY OF STOCKTON PROJECT NO. PO9-148

SAN JOAQUIN LOCAL AGENCY FORMATION COMMISSION

JANUARY 2021

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1.0 INTRODUCTION

1.1 PURPOSE AND OBJECTIVES

The Archtown Industrial Project proposes development of approximately 1.2 million square feet of light industrial buildings on an approximately 79-acre site adjacent to Arch Road and Newcastle Road in southeast Stockton, California. The project requires annexation to the City of Stockton, City approval of pre-zoning and San Joaquin Local Agency Formation Commission (LAFCo) approval of the annexation. The Archtown Industrial Project is a "project" as defined by the California Environmental Quality Act (CEQA) and requires environmental review pursuant to the State CEQA Guidelines.

The City of Stockton as the CEQA Lead Agency approved annexation and pre-zoning of the site in 2011 after adopting a Negative Declaration under the California Environmental Quality Act (CEQA). Based on this approval, the City of Stockton has petitioned LAFCo to approve the proposed annexation.

LAFCo is also responsible for CEQA compliance in connection with its review of the proposed annexation as a CEQA "Responsible Agency." LAFCo's duties as a Responsible Agency are defined in CEQA Guidelines §15096 (Appendix, summarized in Section 1.2).

1.2 CEQA GUIDELINES SECTION 15096, PROCESS FOR A RESPONSIBLE AGENCY

In accordance with §15096, LAFCo must consider the Lead Agency's environmental document and use the document for its approval decision, which may be augmented with other available information, or prepare a new CEQA document pursuant to the requirements of §15096.

The purpose of this document is 1) to evaluate the adequacy of the City's 2011 Negative Declaration for LAFCo's use in acting on the proposed annexation, 2) evaluate the changes in circumstances and and changes in available information since the City's project approval that may be relevant to fulfillment of LAFCo's environmental responsibilities, 3) determine whether the project would involve new or substantially more severe environmental effects than were defined in the 2011 Adopted IS/MND and 4) define appropriate LAFCo CEQA decision-making steps on the proposed annexation. Each of these areas are described in more detail below.

The specific requirements of CEQA Guidelines §15096 are summarized below, and their applicability to the project is discussed in detail in Section 2.0 of this document. The complete text of §15096 is available for reference in the Appendix.

> Subsection "a" The Responsible Agency must consider the Lead Agency's environmental document and draw its own conclusions as to whether the

document adequately addresses the potential environmental effects of the project.

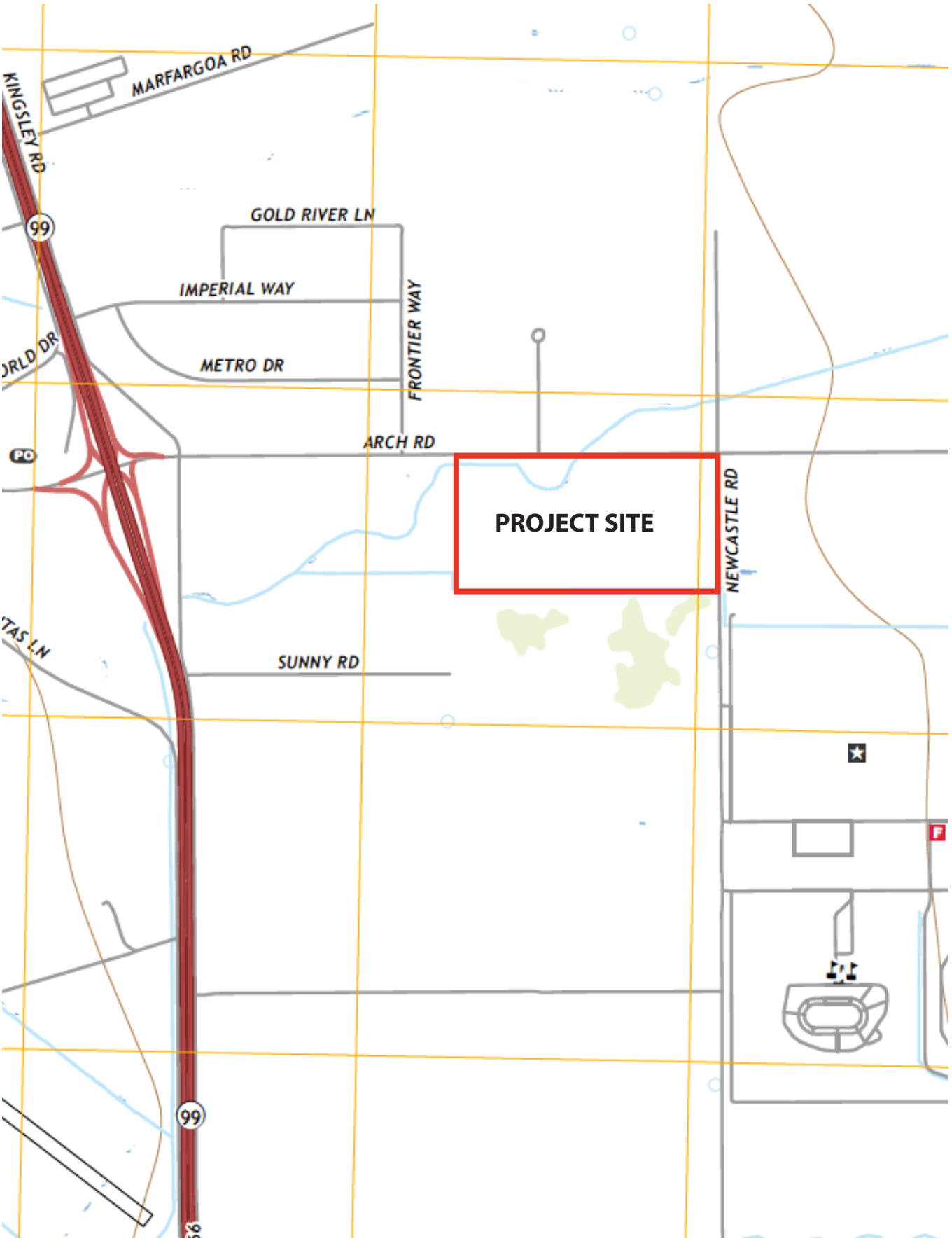
Subsections "b, c and d" These subsections, govern the Responsible Agency's responsibilities under CEQA during the Lead Agency's CEQA review. The City's review of the Archtown project occurred in 2011, and these requirements are not applicable to the project.

Subsection "e" If the Responsible Agency determines that the Lead Agency's document is not adequate for its purposes, this section defines the Responsible Agency's options for action.

Subsection "f" As in subsection "a," the Responsible Agency must consider the Lead Agency's document. This subsection defines when a Responsible Agency may prepare a subsequent or supplemental document as described in CEQA Guidelines §15162-15163.

Subsection "g" The Responsible Agency's CEQA responsibility for impact avoidance and mitigation is limited to environmental effects of those parts of the project which it decides to carry out, finance or approve. In a section related to projects involving EIRs, the subsection implies that the Responsible Agency may add feasible mitigation measures that would substantially lessen or avoid any significant effect the project would have on the environment.

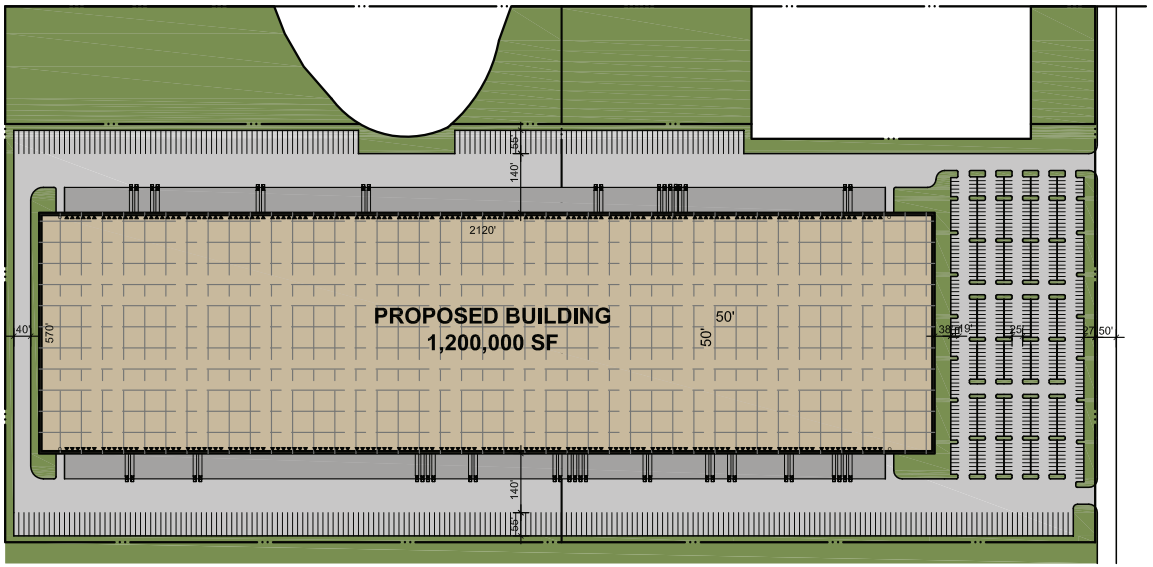
Subsections "h" and "i" The Responsible Agency is required to make the CEQA findings required in Section 15091 of the CEQA Guidelines and is encouraged to file its own Notice of Determination upon approval of the project.



BaseCamp Environmental

Figure 1-1
VICINITY MAP

Figure 1-2
AERIAL PHOTO



PROJECT DATA:

SITE AREA:		
GROSS:	67.55 AC	(2,942,295 SF)
NET:	56.88 AC	(2,456,425 SF)
	(LESS SLOPES, DETENTION)	
BUILDING AREA:		1,200,000 SF
F.A.R.:		.49 (NET)
CAR PRKG PROV:		650 STALLS
PARKING RATIO:		.05/1000
TRUCK PRKG PROV:		334 STALLS
PARKING RATIO:		.03/1000

SITE LEGEND:

- ◄ DOCK HIGH TRUCK DOOR
- ○ GRADE LEVEL TRUCK DOOR

NOTE:
THIS CONCEPTUAL DESIGN PLAN IS BASED UPON A PRELIMINARY REVIEW OF ENTITLEMENT REQUIREMENTS AND ON UNVERIFIED AND POSSIBLY INCOMPLETE SITE INFORMATION, AND IS INTENDED MERELY TO ASSIST IN EXPLORING HOW THE SITE MIGHT BE DEVELOPED.

0 30 60 120 300
scale: 1" = 100'

SNR07-0101-0P

NORTH

FIRST INDUSTRIAL REALTY TRUST

Conceptual Site Plan
scheme #1
10.01.07

Arch Road/New Castle Road
stockton, ca

WARE MALCOMB
Leading Design for Commercial Real Estate
architecture
planning
interiors
graphics
site development
waremalcomb.com

Figure 1-3
PROPOSED SITE PLAN

2.0 ADEQUACY OF THE 2011 ADOPTED IS/MND

2.1 ARCHTOWN PROJECT APPROVAL AND CEQA HISTORY

The Archtown Industrial Project proposes annexation into the City of Stockton, pre-zoning and development of a single parcel (resulting from the merger of four parcels) totaling approximately 79 acres. The proposed annexation area is located in the southeast Stockton metropolitan area at the southwest corner of Arch Road and Newcastle Road, adjacent to and south of the existing Stockton city limits. With the annexation and the City's approved pre-zoning to IL – Industrial, Limited, the site could be developed with as much as 1.2 million square feet of light industrial/warehouse uses. Industrial development would also include on-site circulation and parking, utility extensions, two stormwater detention basins and widening and improvements to the adjacent City streets.

The Stockton General Plan 2040, adopted in 2018, envisions the project site and surrounding areas for industrial development. The Stockton General Plan has designated the site and surroundings for industrial use since 2007. `

An application for annexation, pre-zoning and industrial development of the site was submitted to the City in 2010. The City as Lead Agency prepared the *Archtown Industrial Project Initial Study and Proposed Mitigated Negative Declaration #PO9-148*. After public review, the City adopted the final IS/MND and a Mitigation Monitoring/Reporting Program (MMRP, Exhibit 3) on November 15, 2011. The adopted IS/MND will be referred to throughout this document as the 2011 Adopted IS/MND.

Following its completion of the CEQA process and approval of the project, the Stockton City Council approved the project with conditions and petitioned LAFCo for annexation of the site, but no action was taken on this request. The City's project approval, including the adopted mitigation measures and conditions of approval, remains in force.

In 2019, the project applicant requested that the City submit a new annexation application for the project. As part of the annexation application, updated technical reports were prepared including an air quality/greenhouse gas analysis, and a general review of the CEQA adequacy of the 2011 Adopted IS/MND. These reports are attached as Appendices B and C.

2.2 CITY OF STOCKTON 2011 ADOPTED IS/MND

The 2011 Adopted IS/MND described the project, the project's potential environmental effects and feasible mitigation measures needed to reduce potential environmental effects to a less than significant level. Mitigation measures included in the IS/MND were

attached to the project as conditions of approval. The 2011 Adopted IS/MND was organized in accordance with the CEQA Guidelines Appendix G, Environmental Checklist in use at the time. The IS/MND identified potentially significant environmental impacts for the following environmental issues:

Air Quality/Greenhouse Gases
Biological Resources
Cultural Resources
Hydrology and Water Quality
Land Use
Noise
Transportation

Mitigation measures were identified in the IS/MND that would avoid or reduce the project's potentially significant impacts to a level that would be less than significant. These impacts and adopted mitigation measures, summarized in the adopted MMRP (Exhibit 3), remain applicable to the project, and will be implemented by the City as specific proposals for site development and offsite improvements are submitted for City review and approval.

Three of the mitigation measures listed in the approved MMRP are no longer applicable to the project and are eliminated in the attached MMRP: Mitigation Measures Noise-4 and Noise-5, which both applied to a site development configuration that is no longer proposed, and to noise mitigation for a residence that no longer exists; and Mitigation Measure Traffic-3, which applied to an proposed internal street which is no longer a part of the project. The deletion of these measures is shown explicitly in Exhibit 3, MMRP, which is attached to this report.

2.3 ANALYSIS PROCEDURE AND CONSIDERATIONS

The Archtown applicant retained BaseCamp Environmental, Inc. (BaseCamp) to: 1) review of the 2011 Adopted IS/MND, 2) provide updates to the IS/MND where required to account for current CEQA requirements and any relevant changes in the circumstances of the project, and 3) make a tentative determination of the adequacy of the 2011 Adopted IS/MND for LAFCo's use in its consideration of the project. The BaseCamp review and analysis is documented in ~~Attachment D~~Exhibit 4, which is attached to this report, and summarized the following sections.

2.3.1 BaseCamp Analysis Procedure

BaseCamp reviewed the project's potential environmental effects with reference to the most current version of CEQA Guidelines Appendix G. For each of the environmental subject areas listed in Appendix G, BaseCamp's analysis addressed the following questions:

Was the issue was addressed in the 2011 Adopted IS/MND?

Is new or additional analysis is needed to address the subject, based on the addition of new requirements to the CEQA Checklist, or as a result of changes in the circumstances of the project?

Would the new or additional analysis change the conclusions of the 2011 Adopted IS/MND?

Would the project result in new or more severe environmental effects than were identified in the 2011 Adopted IS/MND? (This question addresses the applicability of CEQA Guidelines §15162 and §15163.)

Are new mitigation measures needed to address the significant environmental effects of the project?

Are there additional feasible mitigating measures available to address the identified significant effects of the project that could or should be considered by LAFCo in its review of the project?

The results of the evaluation with respect to the most recent version of the CEQA Environmental Checklist is provided in narrative form in Section 2.3. The narrative results are summarized in Table 1.

2.3.2 Changes in Circumstances Since 2011 Adopted IS/MND

2.3.2.1 CEQA Changes Since Adoption of the Archtown IS/MND

In the approximately nine years since adoption of the Project IS/MND in November 2011, there have been several changes to the CEQA statute, CEQA Guidelines and CEQA practice. These changes, their applicability to the project and the degree to which they were or were not addressed in the 2011 Adopted IS/MND or in the BaseCamp CEQA Adequacy Review (Exhibit 4) are briefly discussed below in the order of their analysis in the CEQA Checklist and reflected in Table 1. These changes include the following:

In the current version of the Checklist, aesthetic analysis of residential, but not industrial, development is prohibited by CEQA under certain circumstances.

Energy – The CEQA Checklist includes a section considering project impacts related to energy consumption and energy conservation plans.

Greenhouse Gas Emissions – The CEQA Checklist now contains a separate section regarding GHG emissions and consistency with GHG reduction plans.

The Population and Housing section of the CEQA Checklist has a modified population growth question that clarifies that potential impacts should be focused on unplanned population growth.

TABLE 1
SUMMARY OF ADEQUACY EVALUATION, 2011 ADOPTED IS/MND

IMPACT	2011 Adopted IS/MND Conclusion	Substantial Change in Circumstances, New CEQA Analysis Required	2020 BaseCamp Adequacy Analysis Conclusion	Change (Yes/No)?	New or More Severe Significant Effects (16162, 15163), Project Level	New or More Severe Significant Effects (15162, 15163),Cumulative	New Mitigation Required?	New Mitigation or Mitigating Measures Available?
Aesthetics and Visual Resources	Less than significant	No	Less than significant	No	No	No	No	No
Agricultural Resources	Less than significant	No	Less than significant	No	No	No	No	No
Air Quality	Less than significant with mitigation	No	Less than significant with mitigation	No	No	No	Yes	Yes-Atty Gen recommendations
HRA	Not addressed	Yes	Less than significant	Yes	No	No	No	Yes-Atty Gen recommendations
Biological Resources	Less than significant with mitigation	No	Less than significant with mitigation	No	No	No	No	No
Cultural Resources	Less than significant with mitigation	No	Less than significant with mitigation	No	No	No	No	No
Energy	Not addressed	Yes	Less than significant	Yes	No	No	No	No
Geology and Soils	Less than significant	No	Less than significant	No	No	No	No	No
Greenhouse Gas Emissions	Less than significant with mitigation	No	Less than significant with mitigation	No	No	No	Yes	Yes-Atty Gen recommendations
Hazards and Hazardous Materials	Less than significant with mitigation	No	Less than significant	No	No	No	No	No
Hydrology and Water Quality	Less than significant with mitigation	No	Less than significant with mitigation	No	No	No	No	No
Land Use	Less than significant with mitigation	No	Less than significant with mitigation	No	No	No	No	No
Mineral Resources	Less than significant	No	Less than significant	No	No	No	No	No
Noise	Less than significant with mitigation	No	Less than significant with mitigation	No	No	No	No	No
Population and Housing	No impact	No	No impact	No	No	No	No	No
Public Services	Less than significant	No	Less than significant	No	No	No	Yes	Yes-ESFR system, interagency services agreement, other feasible measures
Recreation	Less than significant	No	Less than significant	No	No	No	No	No
Transportation	Less than significant with mitigation	No	Less than significant with mitigation	No	No	No	No	No
Tribal Cultural Resources	Less than significant with mitigation	No	Less than significant with mitigation	No	No	No	No	No
Utilities and Service Systems	Less than significant	No	Less than significant	No	No	No	No	No
Wildfire	Not Addressed	No	Less than significant	No	No	No	No	No

The Transportation section of the CEQA Checklist no longer has questions regarding air traffic patterns or inadequate parking capacity, although parking could still be a potential CEQA issue in particular circumstances. Also, a question has been added regarding project impacts related to vehicle miles traveled (VMT), in accordance with recent State law.

Tribal Cultural Resources - The CEQA Checklist now includes consideration of Tribal Cultural Resources; this area of concern is addressed below.

Wildfire - The CEQA Checklist includes a section that addresses wildfires concern (see below). The 2011 Adopted IS/MND addressed the wildland fire issue in a more abbreviated form and determined potential impacts to be less than significant.

As documented below, all of the environmental issues listed in the current version of the CEQA Checklist have been adequately addressed in the 2011 Adopted IS/MND as augmented by information in the BaseCamp CEQA Adequacy Review (Exhibit 4).

2.3.2.2 New Environmental Justice Considerations

The State of California has recently become more active in promoting environmental justice in land use and environmental planning. State law defines "environmental justice" as "the fair treatment of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." Low-income residents, communities of color, tribal nations, and immigrant communities have historically experienced disproportionate environmental burdens and related health problems. This inequity has resulted from many factors, including inappropriate zoning and incomplete land use planning, which has led to development patterns that concentrate pollution emissions and environmental hazards in areas that have not had the political power to protect themselves.

In 2012, the Legislature passed SB 535, directing that 25 percent of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to disadvantaged communities. To assist in identifying a "disadvantaged community" for the purposes of SB 535, the California Office of Environmental Health Hazard Assessment has developed the California Communities Environmental Health Screening Tool (CalEnviroScreen) to identify environmental justice communities. CalEnviroScreen measures pollution and population characteristics using 20 indicators such as air and drinking water quality, waste sites, toxic emissions, asthma rates, and poverty. It applies a formula to each U.S. Census tract in California to generate a score that rates the level of cumulative impacts on each area. A census tract that scores in the top 25% is considered a "disadvantaged community" as defined by SB 535. The project site is within Census Tract 6077005131. According to CalEnviroScreen, the score for this census tract is within the top 25%, which makes it a disadvantaged community.

Warehouse projects, including recent projects in Stockton, have come under scrutiny from State agencies for their potential environmental impacts on disadvantaged communities. The California Department of Justice, in its comments on the nearby Sanchez-Hoggan warehouse project, recommended that the project include a list of measures designed to reduce air quality and greenhouse gas emissions. Despite the fact that the Sanchez-Hoggan EIR did not indicate that the project would have significant impacts on air quality or greenhouse gas emissions, these measures were ultimately adopted by the City as a condition of approval of the nearby project.

Similar to the approved Sanchez – Hoggan project, the Archtown project would not involve significant health effects on nearby populations. This is demonstrated in a Health Risk Assessment prepared for the project. Nonetheless, as a reflection of increasing environmental justice concerns related to industrial development, these measures are also ~~recommended for inclusion~~included in the Archtown Industrial Project~~. The proposed air quality improvement measures are~~, as shown in Exhibit 2.

2.3.2.3 Cumulative Industrial Development in the Arch Road Vicinity

The CEQA Environmental Checklist requires consideration of impacts that are individually limited, but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, current projects, and probable future projects. The general Arch Road area has been subject to substantial amounts of industrial development since the approval of the Arch Road Industrial Park in the late 1980s. In the more recent past, the project area has supported a number of industrial development projects, some of which have been constructed or have been approved for development and are expected to result in additional development in the immediate future. These projects include the following:

- Norcal Logistics Center – is a light industrial/warehouse development approved in 2015. The development site consists of two properties totaling approximately 325 acres located along Arch Road between Newcastle Road and Logistics Drive. Development of this project as approved would result in a total of 6,280,480 square feet of light industrial development. Portions of this project site have been subsequently developed. An EIR for the project was certified in 2015.

- Sanchez-Hoggan Annexation – is the annexation of two properties totaling approximately 170 acres for proposed light industrial/warehouse development. The Sanchez property is located at the northwest corner of Arch Road and Austin Road, and the Hoggan property is located behind development along Gold River Lane. An EIR for the project was certified by the City in 2020. Annexation was approved by San Joaquin LAFCo in 2020, and construction work has begun on the Sanchez property. Development of the Sanchez-Hoggan project as approved would result in a total of 3,087,388 square feet of light industrial/warehouse development.

- Mariposa Industrial Park – is a proposed annexation and warehouse development project located north of the Norcal Logistics Center site, across North Littlejohns Creek and adjacent to Mariposa Road. The project proposes the development of nine parcels totaling approximately 206 acres and is expected to result in a total of 3.6 million square feet of light industrial/warehouse development. Applications for the project have been submitted to the City and are being processed. An EIR for the project is being prepared and will be circulated to LAFCo for review.

Together these projects, including the proposed Archtown project, would amount to a potential total of 780 acres and approximately 14.2 million square feet of light industrial/warehouse development. The Archtown project would represent approximately 8.5% of the total. The project's potential for cumulatively considerable contributions to cumulative impacts is discussed with respect to each of the issue-specific analyses concerns in Table 1 and discussed in Section 2.3.21(b) below, which reconsiders the project's potential for cumulative environmental effects as evaluated in Subsection "b" of the Mandatory Findings of Significance in the CEQA Checklist.

Recent approvals have raised the profile of issues related to fire protection response time, which were the subject of negotiation between the applicant, the City of Stockton and LAFCo during the annexation process and ultimate approval of the Sanchez-Hoggan project. Information regarding these concerns are raised in the following sections related to CEQA analysis of Public Services at the project and cumulative level.

2.4 RESULTS OF CEQA ADEQUACY ANALYSIS

2.4.1. Aesthetics

Aesthetics issues were addressed in the 2011 Adopted IS/MND and were found to be less than significant. There have been no substantive changes in this issue area related to the project, except that the project area has become more industrialized and less aesthetically sensitive. Aesthetic issues in 2020 would remain less than significant with no mitigation measures required. The Archtown project would be subject to more stringent site plan and architectural design review under current City standards, which would reduce potential for impact. In the current version of the Checklist, aesthetic analysis of residential, but not industrial, development is prohibited by CEQA under certain circumstances; this change is not relevant to the project.

2.4.2. Agriculture and Forestry Resources

Agricultural land conversion issues associated with the project were addressed in the 2011 Adopted IS/MND and were found to require no further discussion per CEQA Section 15183, as these concerns were previously discussed in the City's General Plan (2007) EIR, and because project impacts would be mitigated to the degree feasible under the City's Agricultural Land Mitigation Program. The City's Mitigation Program remains in force, and

there are no other known mitigation measures available for the conversion of agricultural land. There have been no other substantive changes in circumstances related to this issue area.

Since the adoption of the 2011 IS/MND, the project area has become less agricultural and more industrialized as industrial development in the Arch Road area has progressed. Since adoption of the 2011 IS/MND, an additional 665 acres of agricultural land in this area has been converted or approved pursuant to City CEQA analysis and review of the industrial projects listed above. A total of 744 acres of agricultural land in the Arch Road area would be converted or approved for conversion when combined with the 79 acres of agricultural land to be converted as a result of the Archtown project. These and other agricultural land conversion impacts in the City have been anticipated in the Stockton General Plan versions approved in 2007 and 2018 and accounted for in the respective General Plan EIRs. In each case, and cumulatively, these projects require no further discussion per CEQA Section 15183. Similarly, all the projects, including the Archtown project, would be subject to the City's Agricultural Land Mitigation Program, which is the only available feasible mitigation for this impact.

The issue of forest land conversion has been added to the current version of the CEQA Environmental Checklist. Forest land conversion is not an issue with respect to the Archtown project or any other project in the Stockton area, including potential for cumulative effects. There are no forest lands on or in the vicinity of the project site.

2.4.3. Air Quality

Air quality issues were addressed in the 2011 Adopted IS/MND and were found to be less than significant with mitigation. The adopted IS/MND recommended a range of air quality mitigation measures, including submittal of a Dust Control Plan to the San Joaquin Valley Air Pollution Control District (SJVAPCD), standards and enhanced dust control measures to be implemented during project construction, measures to reduce emissions from construction equipment, and compliance with SJVAPCD Rule 9510 - Indirect Source Review. Rule 9510 requires reductions of 20% of the NOx construction emissions and 45% of the PM10 construction exhaust emissions. It also requires reductions of 33.3% of the NOx operational emissions and 50% of the PM10 construction emissions. These same requirements are routinely applied to development projects today.

At the time the 2011 IS/MND was adopted, the San Joaquin Valley Air Basin, within which the Archtown project is located, was determined to be in nonattainment of federal and State air quality standards for ozone, particulate matter 10 micrometers in diameter (PM10), and particulate matter 2.5 micrometers in diameter (PM2.5). For ozone, the Air Basin was designated "Severe" nonattainment under the State 1-hour standard and "Serious" nonattainment under the federal 8-hour standard. The Air Basin was designated in attainment of, or unclassified for, federal and State standards for all other criteria pollutants. There have been two changes since the 2011 IS/MND was adopted. The Air Basin is now in attainment of the federal air quality standard for PM10; however, the Air

Basin is now designated “Extreme” nonattainment for the federal 8-hour ozone standard. The Air Basin status for all other federal and State air quality standards for criteria pollutants has remained the same.

Since the 2011 IS/MND was adopted, the SJVAPCD adopted a revised Guide to Assessing and Mitigating Air Quality Impacts, which set forth revised significance thresholds for project emissions of criteria pollutants. Using the currently approved model for predicting emissions of criteria pollutants, Archtown project emissions would be less than those predicted in the 2011 Adopted IS/MND. Emissions identified as significant in the 2011 Adopted IS/MND are less than significant under the current impact assessment guidelines and significance criteria. These changes did not result in any increase in the air quality impacts identified in the 2011 Adopted IS/MND.

In recent years, the SJVAPCD has increasingly recommended that projects emitting potentially significant amounts of toxic air contaminants such as diesel particulate matter be screened for potential health impacts on nearby sensitive receptors. Diesel particulate matter, a product of combustion of diesel fuel in vehicle and equipment engines, is a toxic air contaminant. Health Risk Assessments (HRAs) have been required for the Sanchez-Hoggan and Mariposa Industrial Park projects; however, neither HRA resulted in significant health risks to nearby sensitive receptors.

The potential health effects of diesel particulate emissions were not addressed in the 2011 Adopted IS/MND. An HRA was prepared for the Archtown project in 2020 as documented in the BaseCamp CEQA Adequacy Review (Exhibit 4). The HRA found that the project would not result in a significant health risk for nearby sensitive receptors, including a residence immediately adjacent to the project site. Despite the fact that the project would not result in significant health risk impacts, a range of potential air quality improvement measures (Exhibit 2) has been recommended by the California Attorney General’s office. This list of measures is recommended for inclusion in the Archtown project as a reflection of the emerging environmental justice issue.

Beside increasing concern regarding health risks, available mitigation measures for potential air quality impacts remain substantively the same as described in the 2011 Adopted IS/MND. Some of these measures, such as SJVAPCD dust control and other regulations, have become routine and as a result are not called out as mitigation measures in some of the City’s most recent CEQA analyses, such as the Sanchez-Hoggan EIR.

2.4.4. Biological Resources

Biological resource issues were addressed in detail in the 2011 Adopted IS/MND and were found to be less than significant with mitigation incorporated. The IS/MND included an extensive list of mitigation measures that included a requirement for special-status plant surveys and a variety of measures for minimizing impacts on wetlands, riparian areas and special-status wildlife. The primary option for mitigation of biological resource impacts

was to be participation in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). The applicability of the SJMSCP was addressed in the 2011 Adopted IS/MND.

There have been no substantive changes in available information related to this issue area since adoption of the 2011 IS/MND, including changes in the administration of the SJMSCP. Mitigation measures prescribed in the 2011 Adopted IS/MND probably exceed current requirements, which are encompassed by implementation of the SJMSCP. These measures would nonetheless be administered by the City of Stockton in its review and approval of subsequent development approvals with due consideration of the treatment of biological issues under the SJMSCP. The CEQA Environmental Checklist was recently updated to include impacts on state-protected wetlands. Wetlands on and adjacent to the site along Weber Slough were addressed in the 2011 Adopted IS/MND and would be considered wetlands under federal jurisdiction; wetland impacts would be avoided by the project.

2.4.5. Cultural Resources

Cultural resource issues were addressed in the 2011 Adopted IS/MND and were found to be less than significant with mitigation incorporated. Mitigation measures for potential cultural impacts included stopping construction work if a cultural resource is encountered until a qualified archaeologist can examine the find and make recommendations on its disposition, stopping work at an inadvertently discovered burial until the County Coroner and a Native American representative can examine the burial and make recommendations, and monitoring of construction activities by a qualified archaeologist and a Native American representative. These measures are shown as CUL-1, CUL-2 and CUL-3 in Exhibit 3, attached to this report.

There have been no substantive changes in this issue area related to the project. Mitigation measures in the 2011 Adopted IS/MND equal or exceed current requirements in requiring archaeological monitoring and are otherwise standard mitigation measures for projects that have been included in the Norcal Logistics Center and Sanchez-Hoggan EIRs.

The CEQA Checklist was amended to include consideration of Tribal Cultural Resources; this area of concern is addressed below.

2.4.6. Energy

An Energy section has been added to the CEQA Environmental Checklist, which addresses consumption of energy resources and compliance with energy conservation plans. This issue was not addressed in the 2011 Adopted IS/MND but was analyzed in the Energy section of the BaseCamp CEQA Adequacy Review (Exhibit 4). The analysis took the above considerations into account and found the potential energy effects of the project to be less than significant.

Since the 2011 Adopted IS/MND the State has required all local jurisdictions to adopt the California Green Building Standards Code (CALGreen), and the California Energy Code has been updated. The most recent version of these codes is from 2019, and the City of Stockton has adopted the 2019 version of these codes. Each version of these codes has mandated greater energy efficiency in building operations. Also, as noted in the Greenhouse Gas Emissions section below, energy efficiency measures were incorporated into the project as part of the 2011 Adopted IS/MND. In general, the adoption of these energy efficiency standards has reduced the potential energy effects of most building projects to a less than significant level.

2.4.7. Geology and Soils

Geology and soil issues were addressed in the 2011 Adopted IS/MND and were found to be less than significant with no mitigation required. There have been no substantive changes in this issue area related to the project, and no mitigation for potential geotechnical concerns is needed. The City of Stockton routinely requires the submittal of a geotechnical report and adherence to geotechnical recommendations as a part of its building permit approval process.

The CEQA Environmental Checklist was recently updated to include analysis of impacts on paleontological resources to the Geology and Soils section; this subject had previously been addressed in the Cultural Resources section. The 2011 Adopted IS/MND addressed potential paleontological resource impacts with a mitigation measure designed to protect such resources should they be encountered during project construction. This approach to mitigation for paleontological resources remains common to CEQA analysis of paleontological impacts today. Also, the City of Stockton has adopted the 2019 California Building Code, with updated requirements.

2.4.8. Greenhouse Gas Emissions

The 2011 Adopted IS/MND discussed greenhouse gas (GHG) issues in its Air Quality section. GHG impacts were found to be less than significant with mitigation incorporated. Mitigation included a variety of energy efficiency, water conservation, and transportation measures, which are now a part of the City's Climate Action Plan and other requirements. Since the 2011 IS/MND was adopted, the following has occurred:

In 2014, the City of Stockton adopted a Climate Action Plan, which addresses GHG emissions in the City, including setting targets for emission reduction.

In 2015, Governor Brown signed Executive Order B-30-15, which established a GHG reduction target of 40% below 1990 emission levels by 2030.

In 2016, the State enacted SB 32, which codified the goals in Executive Order B-30-15 of reducing GHG emissions to 40% below 1990 emission levels by 2030.

In 2017, ARB adopted an updated Scoping Plan that sets forth strategies for achieving the SB 32 target.

A new standalone analysis of the potential impacts of the project on Greenhouse Gas Emissions was included in the BaseCamp CEQA Adequacy Review (Exhibit 4), taking the above new developments into account. Greenhouse gas emissions effects were found to be less than significant as a result of GHG programs implemented since 2011. Similarly, the Sanchez-Hoggan EIR found GHG emissions to be less than significant when project features and Stockton CAP goals were considered. The Norcal Logistics Center EIR identified several measures to reduce GHG emission impacts, such as installing low-flow fixtures and energy-efficient lighting and other features, and water conservation and waste recycling measures. These requirements are encompassed by current City standards adopted since 2011.

2.4.9. Hazards and Hazardous Materials

Hazards and hazardous material issues were addressed in the 2011 Adopted IS/MND and were found to be less than significant with mitigation incorporated. Mitigation measures, related to proximity of the project site to Stockton Metropolitan Airport, would limit the height of project buildings and structures and would ensure the project has no features that attract birds that could be a hazard to aircraft. There have been no substantive changes in this issue area related to the project, and the airport-related measures would remain applicable. The CEQA Environmental Checklist recently added a section that addresses wildfires (see below) which were, in 2011, addressed in the Hazards section. The 2011 Adopted IS/MND addressed the wildland fire issue and determined potential impacts to be less than significant.

2.4.10. Hydrology and Water Quality

Hydrology and water quality issues were addressed in the 2011 Adopted IS/MND and were found to be less than significant with mitigation incorporated. Mitigation measures included compliance with the City's stormwater management requirements and Best Management Practices in reducing pollutants in runoff, and preparation and implementation of a Master Drainage Plan. These mitigation measures are similar to those that have been applied to other projects approved in the area since the 2011 Adopted IS/MND and are being applied to projects in 2020.

Since the 2011 IS/MND was adopted, the following has occurred:

Under State legislation, after July 2, 2016, new development in areas potentially exposed to 200-year flooding more than three feet deep is prohibited unless the local land use agency certifies that 200-year flood protection has been provided, or that "adequate progress" has been made toward provision of 200-year flood protection by 2025.

The State enacted the Sustainable Groundwater Management Act in 2014, which requires the creation of local Groundwater Sustainability Agencies, each of which must prepare and adopt a Groundwater Sustainability Plan to ensure sustainable groundwater yields and prevent groundwater depletion in the agency's jurisdiction. The City chose to join the Eastern San Joaquin Groundwater Joint Powers Authority, which adopted a Groundwater Sustainability Plan in November 2019.

The BaseCamp CEQA Adequacy Review (Exhibit 4) considered these and other occurrences. The proposed project is not located in an area subject to 200-year flooding restrictions. The proposed project will not involve direct groundwater withdrawals but will obtain its water supply from the City of Stockton. As documented in the BaseCamp CEQA Adequacy Review (Exhibit 4), adequate water supply is available to serve the project and other anticipated urban development over the next 20 years.

2.4.11. Land Use

Land use issues were addressed in the 2011 Adopted IS/MND and were found to be less than significant with mitigation incorporated. As noted in the Hazards and Hazardous Materials section above, these measures addressed compatibility with Stockton Metropolitan Airport operations. An updated Airport Land Use Compatibility Plan for Stockton Metropolitan Airport was adopted by San Joaquin County in 2016. The potential airport compatibility impacts of the project were addressed in the BaseCamp CEQA Adequacy Review (Exhibit 4), taking the updated plan into account and were found to be less than significant.

Recently, in comments on the Sanchez-Hoggan EIR, the California Attorney General's Office commented on potential project impacts on disadvantaged communities. These comments were related to the emerging issue of environmental justice, which has not been explicitly identified as a potentially significant effect on the environment and is not currently mentioned in the CEQA Guidelines. Section 2.2.2.2 discusses this issue, which led to a recommendation that additional air quality measures be incorporated into the project; these same measures (Exhibit 2) are recommended for inclusion in the Archtown project.

2.4.12. Mineral Resources

Mineral resource issues were addressed in the 2011 Adopted IS/MND and were found to be less than significant. There have been no substantive changes in the occurrence of mineral resources or related concerns in relation to the project. Mineral resources have not been identified as a significant environmental issue with other projects in the area

2.4.13. Noise

Noise issues were addressed in the 2011 Adopted IS/MND and found to be less than significant with mitigation incorporated. Mitigation measures included limiting construction hours, minimizing Stockton construction equipment noise, and shielding of HVAC units. There have been no substantive changes in this issue area related to the project. One of two adjacent residences in existence in 2011 has now been demolished. Mitigation measures addressing construction noise are routinely assigned to construction projects and similar measures have been identified in CEQA documents for other projects in the area. The Norcal Logistics Center EIR includes a mitigation measure addressing HVAC noise.

2.4.14. Population and Housing

Population and housing issues were addressed in the 2011 Adopted IS/MND and were found to have no impact. The Population and Housing section of the CEQA Environmental Checklist was revised to address unplanned population growth, rather than the inducement of population growth, but, again, the Archtown project does not involve any new housing or population, or any substantive impact in these areas of concern.

2.4.15. Public Services

Public service issues were addressed in the 2011 Adopted IS/MND and were found to be less than significant. In conjunction with the CEQA and LAFCo review of similar and more recent industrial projects in the project area, relatively long response times associated with conversion from rural fire districts to the City of Stockton Fire Department have been the subject of concern. The applicant, LAFCo and the fire protection agencies are discussing an interagency agreement that would provide interim fire service until City of Stockton response times can be reduced.

As documented in Exhibit 4, response times are not considered a significant environmental effect requiring mitigation under CEQA, as decided in *City of Hayward v. Board of Trustees* (2015). Therefore, the BaseCamp CEQA Adequacy Analysis concludes that project impacts related to fire protection services would be *Less Than Significant.* While discussions between the City and LAFCo continue, response time concerns are being addressed. The Sanchez-Hoggan EIR, nonetheless included a mitigation measure requiring the developer to incorporate Early Suppression Fast Response fire sprinkler systems in the project building design and construction. This same requirement is included in the project, as shown in Exhibit 3.

There have been no other substantive changes in this issue area related to the project. Other public services, such as police protection, schools, parks, and libraries, have not been identified as a significant environmental issue with Archtown or the other industrial projects in the area.

2.4.16. Recreation

Recreation issues were addressed in the 2011 Adopted IS/MND, and the Archtown project was found to have no impact. There have been no substantive changes in circumstances or information related to this issue area related. Similarly, recreation not been identified as a significant environmental issue with respect to other industrial projects in the area.

2.4.17. Transportation

Transportation issues were addressed in the 2011 Adopted IS/MND and were found to be less than significant with mitigation incorporated. Mitigation measures included the project contributing its fair share to the construction of a free northbound right-turn lane at the intersection of Arch-Airport Road and State Route 99 ramps, and to construction improvements at the intersection of Arch Road and Newcastle Road. One mitigation measure TRAF-3a is no longer applicable to the project in its current form. This mitigation measure is shown as deleted in Exhibit 3.

Since the 2011 IS/MND was adopted, the questions in the Transportation section of the CEQA Environmental Checklist have been modified, including the addition of a question on consistency with vehicle miles traveled (VMT) plans and removal of questions related to LOS, parking, and air traffic patterns. Transportation issues related to VMT and other changes to the CEQA Checklist were addressed in the BaseCamp CEQA Adequacy Review (Exhibit 4). This analysis found VMT impacts of the project to be less than significant and did not identify any new or substantially more severe environmental effects than those identified in the 2011 Adopted IS/MND. The proposed project will, as in its approved version, include improvements to the adjacent sections of Arch Road and Newcastle Road, and other potential roadway improvements, subject to the review and approval of the City of Stockton.

2.4.18. Tribal Cultural Resources

Tribal cultural resources were addressed in the 2011 Adopted IS/MND as part of the Cultural Resources section. A search of the Sacred Lands File maintained by the Native American Heritage Commission (NAHC) failed to indicate the presence of Native American cultural resources in the area. However, the Yokuts tribal representative, contacted as recommended by the NAHC, expressed concern about the cultural sensitivity of the site and requested monitoring of the site during earth moving activities. A mitigation measure requiring such monitoring ~~was added to~~is included as mitigation measure CUL-1 of the 2011 Adopted IS/MND; this mitigation measure is shown in the Cultural Resources section of Exhibit 3, attached to this document.

Since the 2011 IS/MND was adopted, the following ~~has~~ related to CEQA have occurred:

In 2014, the State Legislature enacted AB 52, which requires CEQA consultation with Native American tribes on projects that could potentially affect resources of value to the tribes. Procedures regarding consultation are specified.

A Tribal Cultural Resources section was added to the CEQA Environmental Checklist after AB 52 took effect. Projects with a Notice of Preparation or a Notice of Intent filed before July 1, 2015 are not subject to AB 52 procedures.

AB 52 consultation is not required for the project; however, local tribes were contacted as part of the preparation of the 2011 Adopted IS/MND. The potential environmental effects of the project on Tribal Cultural Resources were considered in the BaseCamp CEQA Adequacy Review (Exhibit 4) and found to be less than significant with implementation of the cultural resource mitigation measures included in the 2011 Adopted IS/MND, including construction monitoring by Native American representatives as noted above.

2.4.19. Utilities and Service Systems

Utilities and service system issues were addressed in the 2011 Adopted IS/MND and were found to be less than significant. Since the 2011 Adopted IS/MND, the questions in the Utilities and Service Systems section of the CEQA Environmental Checklist have been modified, though the related issues addressed in the modified Checklist remain the same as described in the project 2011 Adopted IS/MND. There have been no substantive changes in this issue area related to the project.

2.4.20. Wildfire

Wildland fire hazards were discussed in the 2011 Adopted IS/MND in the Hazards and Hazardous Materials section, and impacts were determined to be less than significant. Since the 2011 IS/MND was adopted, a Wildfire section has been added to the CEQA Environmental Checklist, including questions on exposure to pollutant concentrations and to hazards from post-fire slope instability. Wildfire issues related to the project were addressed in the BaseCamp CEQA Adequacy Review (Exhibit 4) and found to be less than significant.

2.4.21. Mandatory Findings of Significance

The CEQA Environmental Checklist requires consideration of Mandatory Findings of Significance. The text of each of the three questions addressing mandatory findings concerns are reproduced in full below.

> *2.4.21(a). Would the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?*

The 2011 Adopted IS/MND analyzed project impacts on the subject biological and cultural resource issues and found that impacts would be less than significant with mitigation. The 2011 IS/MND includes mitigation measures described in the Biological Resources and Cultural Resources sections above that would avoid or reduce impacts on these resources, including those specific concerns listed above, to a less than significant level. As discussed in Sections 2.3.5 and 2.3.4, there have been no substantive changes in biological or cultural resource issue areas, no new or more severe impacts and no need for additional mitigation measures. All feasible biological mitigation measures will be applied to the project through participation in the SJMSCP.

2.4.21(b). Would the project have impacts that would be individually limited, but cumulatively considerable?

As described in Section 2.2.2.3, since adoption of the 2011 IS/MND, there are several other industrial projects in the general vicinity of the Archtown project that have been approved and are under construction, have been approved and are expected to be under construction in the near future or have been proposed and are considered likely to be approved.

The environmental impacts of these projects, in addition to the impacts of the Archtown project, might be cumulatively considerable even if impacts at the individual project level are less than significant. An analysis of the potential for cumulatively considerable impacts is presented below by environmental issue.

The initial part of each analysis relies on the "general plan approach" to cumulative impact analysis as authorized in CEQA Guidelines §15130(b) using the City's recently certified EIR for the Stockton General Plan 2040. The General Plan 2040 EIR discusses the cumulative impacts associated with planned development of the Stockton Planning Area, including the Archtown project site and the listed cumulative industrial projects, under the newly adopted General Plan.

Aesthetics and Visual Resources, Cumulative. The potential aesthetic effects of urban development, including lands designated for industrial development, were addressed extensively in the Stockton General Plan 2040 and the associated EIR. Planned urban development in the Stockton area would result in extensive changes in viewsheds, as lands in and surrounding the existing urban area are converted from rural agricultural to urban use. The General Plan EIR (GPEIR) found these cumulative impacts to be less than significant.

The proposed project would result in 79 acres of industrial development in a portion of southeastern Stockton designated for industrial development. The project would contribute approximately 10.1% to the approximately 780 acres of foreseeable industrial development in the Arch Road area, including the past and future industrial projects listed in Section 2.2.2.3.

The aesthetic environment of the project site and vicinity is already dominated by views of large nearby light industrial, warehouse, and institutional buildings. Cumulative industrial development would be consistent with the existing industrial/warehouse landscape. There are no scenic vistas or resources in the project vicinity, other than the riparian area along North Littlejohns Creek, which would not be affected by the proposed project. The cumulative projects would not result in a cumulatively considerable contribution to a significant cumulative impact.

Similarly, the project vicinity is subject to extensive night lighting, including parking and circulation areas on existing Norcal Logistics Center industrial sites to the north and California Department of Corrections and Rehabilitation facilities and the extensively illuminated BNSF intermodal facility to the east. Further development of the cumulative industrial projects, including the proposed project, would be required to meet City design review standards, including applicable city outdoor lighting standards intended to minimize any light and glare impacts on adjacent properties. The GPEIR found the light and glare effects of new development would be less than significant with the implementation of City lighting standards. The project would not result in a considerable contribution to any significant cumulative light and glare effect.

Agricultural Resources, Cumulative. The Archtown project would result in the conversion of 79 acres of Prime Farmland and Farmland of Statewide Importance, which are considered Farmland under CEQA Guidelines Appendix G. The other cumulative projects in the vicinity would, or are anticipated to, convert an estimated 483acres of Farmland to non-agricultural uses. The impacts of agricultural land conversion in conjunction with urban development was identified in the Stockton GPEIR as a significant and unavoidable adverse effect. Development of the project site, along with other projects in the vicinity, will contribute to this impact but will also be subject to the City of Stockton's Agricultural Land Mitigation Program. This program is the only available mitigation for agricultural land conversion, and it applies to all projects under City jurisdiction that involve conversion of agricultural land to a non-agricultural use. Compliance with this program would partially compensate for the impact of Farmland conversion but would represent best available mitigation for agricultural land conversion impacts.

CEQA Guidelines Section 15152(d) states that where an EIR has been prepared and certified for a plan, a lead agency for a later project consistent with the plan should limit an EIR on the later project to effects which 1) were not examined as significant effects on the environment in the prior EIR, or 2) are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means. Therefore, no new or more severe impacts related to agricultural lands should be considered to be associated with the project. Therefore, based upon the criteria set by CEQA Guidelines Section 15152(d), the project would not involve a considerable contribution to cumulative agricultural resource impacts.

Air Quality, Cumulative. The project, along with the cumulative industrial projects in the vicinity, would contribute to potential air quality impacts both at the regional level - the

San Joaquin Valley Air Basin - and the local level. Past and present agricultural, urban, and other development within the Air Basin has resulted in significant air quality impacts. The Air Basin has been designated "nonattainment" for federal and/or state ambient air quality standards for two criteria air pollutants: ozone and particulate matter.

The potential air quality impacts of planned urbanization in the City of Stockton were addressed in the Stockton General Plan 2040 EIR and were found to be significant. The General Plan 2040 EIR identified mitigation measures, including source controls and transportation demand management systems, and these measures were incorporated into the General Plan 2040 and are a part of the City's environmental review, permitting and fee structures. Nevertheless, even with the adopted mitigation measures, the GPEIR identified the cumulative impact of planned urbanization on ozone precursor emissions as significant and unavoidable. A Statement of Overriding Considerations was adopted for this impact in conjunction with the approval of the Stockton General Plan 2040.

An Air Quality/Greenhouse Gas report (reported in the BaseCamp CEQA Adequacy Review, Exhibit 4) for the project quantifies and describes the criteria air pollutant contributions of the proposed project with respect to the Air Basin standards. CalEEMod estimates of air pollutant emissions from construction and operation of the proposed project indicate that neither SJVAPCD construction nor operational significance thresholds would be exceeded, with application of SJVAPCD rules. The significance thresholds are applied to evaluate regional impacts of project-specific emissions of air pollutants. Regional impacts of a project can be characterized in terms of total annual emissions of criteria pollutants and their impact on SJVAPCD's ability to reach attainment of criteria pollutant standards.

The project would be subject to the range of SJVAPCD rules, and the mitigation measures listed in the 2011 Adopted IS/MND encompass all of these rules, including the Indirect Source Rule (SJVAPCD Rule 9510). The project and the cumulative industrial projects would contribute to the cumulatively significant air quality effect identified in the GPEIR. However, with the adopted IS/MND mitigation, the project would not result in a considerable contribution to a significant cumulative air quality impact in the Air Basin. Similarly, the approved industrial projects in the vicinity were found to also have air pollutant emissions that would not exceed significance thresholds, with application of SJVAPCD rules and.

The proposed project would involve emissions of TACs, mainly diesel PM from truck traffic. Other similar projects in the area would also contribute diesel PM emissions. As noted, an HRA was conducted for the project and was found to not significantly increase the risk of cancer, even at an adjacent sensitive receptor. An HRA was also conducted for the Sanchez-Hoggan project with the same result. The distance between the approved industrial projects in the Archtown area indicate that there would be little overlap in cancer risk contours delineated by the HRAs. In addition, there are few sensitive receptors in the vicinity that would be affected by these projects~~, mainly somewhat~~; sensitive receptors include ~~distant~~ rural residences located 300 feet or more from any of the

industrial sites. The Attorney General's Office, in its comments on the Sanchez-Hoggan project, suggested several air quality improvement measures that would help reduce diesel PM and other pollutant emissions, many of which were incorporated in the Sanchez-Hoggan project. Although these measures are not required to reduce significant health risk impacts, ~~it is recommended that these~~the air quality improvement measures shown in ~~(~~Exhibit 2 are ~~) be~~ incorporated into the Archtown project, as shown in Exhibit 3 and displayed in Exhibit 2 of this report ~~as well~~.

Overall, with implementation of the adopted mitigation measures, the project would not have impacts on air quality that are cumulatively considerable.

Biological Resources, Cumulative. The project vicinity has been subject to significant biological resource impacts because of agricultural activities and urban development. As a result, the project vicinity does not support substantial populations of common or sensitive wildlife species. However, North Littlejohns Creek and Weber Slough, which are in the project area, have riparian vegetation that could provide nesting habitat for bird species, and potentially provide habitat for special-status species.

Weber Slough flows along a portion of the proposed project site. It contains riparian vegetation and is considered to have habitat value. The 2011 Adopted IS/MND identified mitigation measures designed to reduce project impacts on Weber Slough, thereby reducing the cumulative effects of the proposed project on this resource. Other projects in the vicinity have mitigation measures to reduce impacts on biological resources. In addition, the listed projects in Section 2.2.2.3 are or will be required to observe U.S. Fish and Wildlife Service restrictions on development along North Littlejohns Creek to protect potential giant garter snake. Both the Sanchez-Hoggan and the Norcal Logistics Center projects are required to obtain Section 404 permits for any activity within Weber Slough, which crosses both project sites.

All projects in the vicinity would be required to participate in the SJMSCP by the respective permitting agencies. The SJMSCP would require preservation of existing sensitive lands, creation of new comparable habitat on the project site, or payment of fees that would be used to secure preserve lands outside the project site to compensate for the loss of sensitive habitat. In addition, the SJMSCP would require compliance with ITMMs that avoid direct impacts of development on special-status species or their habitats that may be affected. SJMSCP compliance would ensure that project contributions to cumulative biological impacts would not be considerable.

Cultural Resources, Cumulative. The Stockton General Plan 2040 EIR evaluated cultural resource impacts of development under the Stockton General Plan 2040 and concluded that impacts would be less than significant. No known important archaeological or historically significant resources are located on the proposed project site. Mitigation measures described in the 2011 Adopted IS/MND would ~~address~~ minimize any impacts on cultural resources or human burials by requiring archaeological and Native American monitoring during construction and further protections that would be triggered if cultural

resources or burials are encountered during project construction~~, thereby ensuring~~ . These measures will ensure that impacts of any discovery of cultural resources would be reduced to a level that is less than significant.

The Sanchez-Hoggan project was identified as a project that could potentially affect tribal cultural resources by the Yokuts tribe, and the proposed Mariposa Industrial Park project is nearby. No potential tribal cultural resources were identified in the Norcal Logistics Center EIR. All projects in the vicinity have or will have mitigation measures addressing any cultural resources or human remains uncovered during project construction. Such mitigation measures are standard for all projects subject to CEQA review. The project would not involve a considerable contribution to any cumulative cultural resource impact in the project vicinity.

Energy, Cumulative. Proposed project impacts related to energy were not analyzed in the 2011 Adopted IS/MND, but the BaseCamp CEQA review of the document did not identify any significant impacts. The Stockton General Plan 2040 EIR did not identify any significant energy issues associated with development under the Stockton General Plan 2040. PG&E, the energy supplier to the Stockton area, has existing electricity and natural gas facilities in the vicinity and can supply these energy sources to the project and other projects in the vicinity without substantially expanding its existing infrastructure.

Proposed projects would be required to comply with energy efficiency standards in the building codes in effect at the time of their approval. These codes are updated regularly, and the updated codes generally have more stringent energy efficiency standards than previous versions. It is expected that energy demands of the project and future development on PG&E's energy supplies would be not as great as past development under previous codes. The project would not make a considerable contribution to cumulative impacts related to energy.

Geology and Soils, Cumulative. Potential impacts associated with geology and soils are assumed to be localized. The Stockton General Plan 2040 EIR did not identify any significant geology, soil, or mineral resource impacts associated with development under the Stockton General Plan 2040. As noted, the proposed project would not result in potential geology and soils impacts, including potential project exposure to geologic hazards, seismic shaking, soil-related hazards, and soil erosion.

All projects would be required to comply with the applicable California Building Code provisions and Construction General Permit conditions, which would minimize soil impacts of the project and other projects in the vicinity. Also, all projects would conduct a geotechnical study that would identify potential soil issues specific to the project site and would make recommendations on project design and construction to address identified issues. The proposed project would not involve the potential for combined geology or soils impacts or for a considerable contribution to any cumulative geology or soils impacts.

Greenhouse Gas Emissions, Cumulative. GHG emissions are related to global climate change. Global climate change is a distinct CEQA issue in that, while a project may generate GHG emissions, the impacts of such emissions are global. As such, the impacts of a project's GHG emissions are considered cumulative in nature.

The potential GHG impacts of planned urbanization in the City of Stockton were addressed in the Stockton General Plan 2040 EIR and were found to be significant. The General Plan 2040 EIR identified mitigation measures, including adoption of the CAP, and these measures were incorporated into the General Plan 2040 and are a part of the City's environmental review, permitting and fee structures. Nevertheless, even with the adopted mitigation measures, the cumulative impact of planned urbanization on GHG emissions would be significant and unavoidable. A Statement of Overriding Considerations was adopted for this impact in conjunction with the approval of the Stockton General Plan 2040.

In accordance with CEQA Guidelines Section 15152(d), this analysis focuses on project-specific effects. The Air Quality/Greenhouse Gas Report prepared for the proposed project concluded that operational GHG emissions, with incorporation of project features and compliance with SJVAPCD rules and regulations, would be consistent with the GHG reduction objectives of the City's Climate Action Plan. Other projects in the vicinity were analyzed for their GHG impacts and were also found to be consistent with GHG reduction plans. On that basis, the proposed project would be consistent with the Climate Action Plan and would not result in a considerable contribution to a significant cumulative GHG impact.

Hazards and Hazardous Materials, Cumulative. Hazardous material impacts are assumed to be localized. The Stockton General Plan 2040 EIR did not identify any significant hazard or hazardous material impacts associated with development under the Stockton General Plan 2040. There are no recorded sites of known contamination on the project site or in the immediate vicinity. Development of the proposed project and other projects in the area may lead to greater amounts of hazardous materials being transported and stored in the vicinity. However, these materials would be subject to existing permitting requirements and regulations related to hazardous materials handling and emissions control for businesses to be located in the proposed development. These would include preparation and implementation of a Hazardous Materials Business Plan for activities that would transport or store certain quantities of hazardous materials. Compliance with these requirements and regulations would reduce the potential for hazardous material releases, and consequently any on-site and off-site health effects, to a level that would be less than significant.

The project vicinity is in a developing urban area, where wildland fire hazards are low. The addition of buildings and pavement from development of this and other projects would further reduce the potential risk in the project vicinity. The project is near Stockton Metropolitan Airport but outside the safety zones established in the airport's Land Use Compatibility Plan, so employees would not be subject to significant risks associated with

airport operations. In summary, the project would not involve a considerable contribution to any cumulative hazard or hazardous material impacts.

Hydrology and Water Quality, Cumulative. Project hydrological impacts can contribute to cumulative impacts in a watershed for surface waters, or a groundwater basin for groundwater. As noted, Weber Slough flows past the proposed project site, as well as the Sanchez-Hoggan site. North Littlejohns Creek is north of the project site and borders the Norcal Logistics Center, Sanchez-Hoggan, and Mariposa Industrial Park sites. Both streams discharge into French Camp Slough, so both streams are part of the French Camp Slough watershed.

The hydrology and water quality impacts of planned urbanization under the Stockton General Plan 2040 were analyzed in the Stockton General Plan 2040 EIR. The EIR identified one potentially significant impact – existing and planned storm drainage infrastructure could be undersized or otherwise inadequate, leading to potential flooding and polluted runoff. Mitigation described in the Stockton General Plan 2040 EIR would require preparation of a citywide storm drainage master plan that includes hydrologic and hydraulic modeling for existing and Year 2040 land uses. Preparation and implementation of this master plan would reduce drainage impacts to a level that would be less than significant. The project would include a standalone drainage system, which would collect site runoff and discharge it to adjacent Weber Slough if and when capacity is available to accept. The project would not contribute substantially to citywide storm drainage concerns.

The proposed project would involve potential water quality impacts, mainly sediment discharges from soil disturbance. The same impacts have been identified with other projects in the area. However, mitigation measures in the 2011 Adopted IS/MND would reduce potential sedimentation and other contamination of surface waters. Other projects in the area would be subject to similar mitigation measures, including compliance with storm water BMPs and other provisions of the Construction General Permit, the City's Storm Water Management Program, and the City's Storm Water Quality Control Criteria Plan. As a result, the projects would not involve a considerable contribution to any significant cumulative surface hydrology or water quality effects.

The project site is located within the Eastern San Joaquin Valley Subbasin, which is the geographic context for cumulative groundwater analysis. A Groundwater Sustainability Plan to stabilize groundwater levels in the Subbasin has been adopted by the local Groundwater Sustainability Agency, of which the City of Stockton and San Joaquin County are members. The proposed project, along with other development projects in the area, would involve no potential groundwater effects that are not already accounted for in existing demand projections and analyses, such as in the City of Stockton's Urban Water Management Plan. The development projects in the vicinity would obtain their potable water from the City's water system, which derives 75% of its supply from surface water sources. As a result, the project would not involve a considerable contribution to any significant cumulative groundwater supply or water quality effects.

Land Use, Cumulative. Impacts related to land use are generally defined by the jurisdiction within which a project is or would be located. The project site is currently under County jurisdiction but is within the Planning Area of the Stockton General Plan 2040. The Stockton General Plan 2040 EIR did not identify any significant land use impacts associated with development under the Stockton General Plan 2040. The proposed project is near developed or approved light industrial/warehouse development projects, and the proposed development on the project site would be similar to those other projects. The proposed project and the other projects either have been or are proposed to be annexed to the City of Stockton, and all the projects would be consistent with the land use designations under the Stockton General Plan 2040.

The 2011 Adopted IS/MND identified potentially significant impacts on the environment that could be reduced with mitigation to a level that would be less than significant. Other projects in the area have undergone CEQA review that identified potentially significant impacts that would be avoided or minimized with implementation of mitigation measures. The project would partially fulfill the City's land use plans for the Arch Road area and would not make a considerable contribution to cumulative impacts related to land use.

Mineral Resources, Cumulative. The Stockton General Plan 2040 EIR did not identify any significant mineral resource impacts associated with development under the Stockton General Plan 2040. As noted in the 2011 Adopted IS/MND, there are no mineral resources on the project site. No such resources have been identified on other project sites in the vicinity. The project would not contribute to cumulative mineral resource impacts in the County.

Noise, Cumulative. Cumulative noise impacts are assumed to be localized. The impacts of noise are reduced with distance; unless there is a very significant existing or proposed noise source, the potential for cumulative impacts will ordinarily be limited to a few hundred yards.

The potential noise impacts of planned urbanization in the City of Stockton were addressed in the Stockton General Plan 2040 EIR and were found to be significant. Specifically, noise from traffic along identified road segments would be substantially greater than under existing conditions. State Route 99 between Farmington Road and Mariposa Road is the closest such segment to the project site and vicinity. No feasible mitigation measures could be identified to reduce this impact to a level that would be less than significant, so this impact was considered significant and unavoidable. A Statement of Overriding Considerations was adopted for this impact in conjunction with the approval of the Stockton General Plan 2040.

In accordance with CEQA Guidelines Section 15152(d), this analysis focuses on project-specific effects. Traffic noise levels associated with the project were evaluated in the 2011 Adopted IS/MND. It was determined that, under Cumulative Plus Project conditions, project traffic noise impacts would be less than significant with implementation of

mitigation measures. This analysis considered traffic and site noise effects of other projects in the area. The approved projects have had their noise impacts assessed in CEQA documents and feasible mitigation measures are included as conditions of approval. The conclusions in these documents were similar to those of the 2011 Adopted IS/MND. Mitigation measures were identified for all projects to reduce noise from construction activities, and the Archtown and Norcal Logistics Center project have mitigation for HVAC units.

It should be noted that land uses sensitive to noise, such as residences and schools, are uncommon in the area. There are scattered residences in the vicinity; however, most residences are located in the area north of the Norcal Logistics Center and the Hoggan portion of the Sanchez-Hoggan site, and west of the proposed Mariposa Industrial Park. Mitigation that has been or is expected to be implemented for these projects would reduce noise impacts on these residences. The project would not make a considerable contribution to cumulative noise impacts.

Population and Housing, Cumulative. Population and housing impacts typically occur in the area within which the project is located. The project is proposed to be annexed to the City of Stockton. The population and housing impacts of planned urbanization in the City of Stockton were addressed in the Stockton General Plan 2040 EIR and were found to be significant. Specifically, development under the General Plan 2040 would induce substantial job growth that would exceed SJCOG employment projections. No feasible mitigation measures could be identified to reduce this impact to a level that would be less than significant, so this impact was considered significant and unavoidable. A Statement of Overriding Considerations was adopted for this impact in conjunction with the approval of the Stockton General Plan 2040.

In accordance with CEQA Guidelines Section 15152(d), this EIR focuses on project-specific effects. No existing residents or housing units are located on or adjacent to the project vicinity, other than a rural residence to the north. This residence would not be removed or otherwise altered by project site development. While the project would contribute to employment growth, this employment growth would be consistent with the land use designations under the Stockton General Plan 2040, which anticipates industrial development on the project site and vicinity. Project development is not anticipated to have any impact on population in the Stockton area as planned for in the Stockton General Plan 2040. The other industrial projects in the area also propose light industrial/warehouse development and would be consistent with the Stockton General Plan 2040 designations. Population and housing impacts of these other projects would be the same as the proposed project, as no housing would be removed, and population impacts would not be other than what is anticipated in the Stockton General Plan 2040. The project would not involve a significant contribution to cumulative population or housing effects beyond what is predicted in the Stockton General Plan 2040 EIR.

Public Services, Cumulative. Public service impacts generally occur within the jurisdictional boundary of the local government or special district providing the service.

The Stockton General Plan 2040 EIR did not identify any significant public service or recreation impacts associated with development under the Stockton General Plan 2040. However, as noted, an issue has been raised regarding long response times for fire protection services in southeast Stockton, particularly to recently annexed areas. Project impacts on fire protection services would be mitigated in part by the required installation of ESFR sprinkler systems in proposed building development. This mitigation measure has been incorporated in the Sanchez-Hoggan project, and it is expected that the proposed project would also include this mitigation measure to reduce fire risks associated with longer response times.

The project will, with other planned development, result in long-term needs to reduce response times. The Stockton Fire Department intends to address these concerns, considering the available options. The project will be required to pay Public Facility Fees that could be used for the future construction of a fire station, if required. If proposed, development of a new fire station would be subject to CEQA review, as required.

Annexation of the project site will require the detachment of the proposed parcel from the Montezuma Fire Protection District. So that this district is not economically challenged, the applicant will be required to enter into a revenue agreement with the district prior to annexation. Despite detachment of the project from the rural fire district, the Montezuma Fire Protection District will continue to temporarily serve the project site. The project, like the Sanchez-Hoggan project, will contract with the Montezuma Fire Protection District for additional fire response until the City is prepared for the transfer of services.

Stockton police facilities for the City as a whole would need to be renovated or moved to another location. As with fire facilities, the project would pay Public Facility Fees that could be used for future improvements to police facilities which also would be subject to CEQA review and must mitigate for any identified significant impacts. The project would not make a considerable contribution to cumulative impacts on fire or police facilities.

Other public facilities, such as schools, parks, and libraries, have demand that is driven by population growth. As the proposed project and other projects in the area are light industrial in character, they are not expected to contribute to a significant increase in population. The project would not make a considerable contribution to cumulative impacts on these facilities.

Recreation, Cumulative. As with other public services, recreation impacts generally occur within the jurisdictional boundary of the local government or special district providing the service. The Stockton General Plan 2040 EIR did not identify any significant public service or recreation impacts associated with development under the Stockton General Plan 2040. As a light industrial/warehouse project, the proposed project would not involve demands on parks and recreation. Other projects are similar in character to the proposed project and therefore would have similar impacts on recreation. The project would not make a considerable contribution to cumulative impacts on recreation services.

Transportation, Cumulative. Cumulative transportation impacts, primarily vehicular traffic, are addressed within the area potentially impacted by a proposed project, typically within a certain radius from the project site. This is the case with the proposed project, the potential traffic impacts of which are addressed in the 2011 Adopted IS/MND. However, the traffic analysis in the 2011 Adopted IS/MND was conducted prior to the approval or anticipated application of the listed projects. Therefore, additional evaluation based on the Stockton General Plan 2040 EIR and individual project CEQA documents is required.

The potential transportation impacts of planned urbanization in the City of Stockton were addressed in the Stockton General Plan 2040 EIR and were found to be significant. The General Plan 2040 EIR identified mitigation measures, including specific improvements. These measures were incorporated into the Stockton General Plan 2040 and are a part of the City's environmental review, permitting, and fee structures. These measures are listed in Exhibit 1 of this report, which summarizes all of the mitigation measures adopted with the General Plan 2040. Nevertheless, even with the adopted mitigation measures, cumulative transportation impacts related to increases in vehicle traffic were determined to be significant and unavoidable. A Statement of Overriding Considerations was adopted for this impact in conjunction with the approval of the Stockton General Plan 2040.

The Sanchez-Hoggan Annexation EIR considered the potential for cumulatively considerable contributions to traffic impacts through a project traffic study by KD Anderson and Associates (2019). The cumulative scenarios assumed future development that is consistent with the Stockton General Plan 2040 and roadway improvements consistent with the long-term future context. This includes development of the project site consistent with what is proposed by the Archtown project. Sanchez-Hoggan project impacts under Cumulative conditions were evaluated in the traffic study for roadway segments only; no intersections or ramp junctions were studied. Under Cumulative Plus Project conditions, four roadway segments were determined to operate at unacceptable LOS. However, LOS would also be unacceptable under Cumulative No Project conditions, and the project-related increase in volume would not be greater than five percent. Therefore, based on criteria in the City of Stockton Transportation Impact Analysis Guidelines, these impacts are considered less than significant, and no mitigation is required.

The Sanchez-Hoggan traffic study discussed impacts related to VMT under Cumulative Plus Project conditions (KD Anderson 2019). The analysis defined VMT impacts on a per capita/service population basis based on Stockton General Plan EIR data and a 15% VMT reduction threshold established by the Office of Planning and Research. The CalEEMod air quality modeling program, which produces VMT data, indicates that implementation of mitigation features that reduce air and GHG emissions, including SJVAPCD Rule 9410, would also reduce VMT by about 15%. With the application of mitigation, the VMT per capita under Cumulative Plus Project conditions would be 20.90%, which is 15% below the 2040 baseline VMT for the City as a whole and just under the 21% reduction in the 2040 VMT expected from urban development under the General Plan.

It is expected that the proposed project would have cumulative LOS impacts and VMT impacts that are ~~little different~~similar to ~~than~~ those identified with the Sanchez-Hoggan project. Proposed project development is consistent with the Stockton General Plan 2040 designation for the site; therefore, traffic generated by the project would not vary significantly from what was ~~assumed~~ projected in the Stockton General Plan 2040 EIR and the Sanchez-Hoggan EIR. Other projects in the vicinity are likewise consistent with Stockton General Plan 2040 designations; as such, traffic generated by these projects would not vary significantly from assumptions in the GPEIR. The project would not make a considerable contribution to cumulative traffic impacts.

Tribal Cultural Resources, Cumulative. Tribal cultural resources were not an issue area included in the 2011 Adopted IS/MND. The proposed project was approved before the passage of AB 52, so no tribal consultation occurred or is required. However, contact was attempted with tribes on the Norcal Logistics Center and Sanchez-Hoggan projects. As noted, a response was received from the Yokuts tribe on the Sanchez-Hoggan project, indicating the presence of a potential tribal cultural resources. As noted, no known important archaeological or historically significant resources were recorded on the project site, but mitigation measures requiring archaeological and Native American monitoring would reduce potential impacts on any tribal cultural resource encountered during project construction to a level that would be less than significant. This mitigation has been identified for other development projects in the area. The project is not expected to involve a considerable contribution to any cumulative tribal cultural resource impacts.

Utilities and Service Systems, Cumulative. Utility impacts generally occur within the service area of the utility providing service to the project site. The Stockton General Plan 2040 EIR indicates that the City would have adequate water, wastewater, and storm drainage capacity available to serve proposed development under the Stockton General Plan 2040, with which the proposed project and other approved or anticipated development is consistent. Also, energy and solid waste needs would be served. While the proposed project and other development projects in the area would contribute new utility demands, the combined projects would not require additional or expanded major facilities, as adequate mains exist in the area, and the City was found to have adequate water supply and wastewater treatment capacity to serve all projects. The project would not result in a significant cumulative impact on utilities or make a considerable contribution to any such effect.

2.3.21(c). Would the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?

The 2011 Adopted IS/MND noted potential effects related to air quality, hazardous materials, and noise. None of these effects would result in any significant impacts with incorporation of mitigation measures. No other environmental effects were identified that would or could result in substantial adverse effects on human beings.

2.5 ADEQUACY OF THE 2011 IS/MND FOR LAFCo PURPOSES

Based on the analysis in Section 2.4, the 2011 Adopted IS/MND, coupled with additional environmental information and analysis presented in this document and appendices, is adequate for the purposes of San Joaquin LAFCo's review of the proposed project as a Responsible Agency under CEQA. As a result, the proposed annexation request does not require further environmental review under CEQA. Although there have been changes in circumstances surrounding the project exist, including changes in the required scope of CEQA review, and ongoing industrial development of the Arch Road area, none of these would result in substantial changes in the potentially significant environmental effects of the project as identified in the 2011 Adopted IS/MND. Neither changes in the project nor changes in the circumstances of the project would involve new significant environmental effects, result in a substantial increase in the severity of any significant environmental effects or require additional mitigation measures in relation to the 2011 Adopted IS/MND. Therefore, the requirements of CEQA Guidelines §15162 and §15163 are not triggered, and no subsequent or supplemental environmental document is required.

The project, incorporating the mitigation measures included in the 2011 Adopted IS/MND, will not result in a significant effect on the environment. The City's approval of the project requires that the project implement all of the applicable mitigation measures as shown in the Mitigation Monitoring/Reporting Plan (Exhibit 3). The project will also be subject to additional mitigating requirements as adopted by the City as a part of its 2018 approval of the Stockton 2040 General Plan following certification of the General Plan EIR. Exhibit 1 provides a comprehensive listing of the mitigation measures adopted by the City as a part of their certification of the General Plan 2040 EIR together with a description of the legal authority for implementing these measures and their applicability to the Archtown project. In addition to the General Plan 2040 EIR mitigation measures, Exhibit 1 also lists the mitigation measures applied to the Archtown project in the 2011 Adopted IS/MND as well as measures attached to other recently-approved industrial projects in the Arch Road vicinity.

2.6 ADDITIONAL MITIGATION MEASURES

BaseCamp, using a comparison table prepared by City staff and submitted separately, has reviewed the CEQA documents pertaining to the other industrial development projects in the Arch Road area. This review included consideration of the impacts identified as significant and the mitigation measures proposed in each case to reduce the significant effects associated with these projects to a less than significant level. This review, capsulized in the City's MMRP Comparison Table, indicates that, with the exception of a requirement for Early Fire Suppression Response (ESFR) improvements on the Sanchez-Hoggan project, no mitigation measures have been required of any of the other listed industrial projects that are not already addressed by equal or more restrictive measures in the 2011 Adopted IS/MND. None of the mitigation measures associated with the other projects would substantially reduce the potentially significant

environmental effects of the project and are not required to support LAFCo's use of the 2011 Adopted IS/MND for the purposes of considering the proposed annexation project. The ESFR measure is, however, included in the project and shown in Exhibit 3 attached to this document. ~~The ESFR requirement on the Sanchez-Hoggan project is not technically a mitigation measure required by CEQA.~~

BaseCamp has also considered each of the potentially significant environmental effects of the proposed annexation project as described in the 2011 Adopted IS/MND as to whether there exist other potential mitigating actions that could, for the general benefit of the environment, add to the mitigation measures included in the 2011 Adopted IS/MND, or that would further reduce the project's environmental effects, despite the fact that all of these effects are less than significant or would be reduced to a less than significant level with the City's adopted mitigation measures shown in the MMRP (Exhibit 3).

As discussed in Section 2.4 above, BaseCamp's analysis did not reveal any potentially significant effects in any of the issue areas that need to be addressed under current CEQA requirements. However, the analysis did address an emerging concern regarding environmental justice, which was first surfaced and discussed during the final consideration of the Sanchez-Hoggan project and EIR. Although environmental justice is not yet a required subject of analysis under CEQA, has no defined significance threshold and does not provide a nexus for mitigation, it is clearly an issue of growing concern, including amongst the state agencies commenting on the Sanchez-Hoggan EIR and other industrial projects.

As a means for addressing these concerns, the City of Stockton, in cooperation with the state and regional air quality agencies, developed a list of additional air quality improvement measures that would reduce air emissions associated with industrial development, including air toxics. These measures ~~that~~ were attached to the Sanchez Hoggan project as conditions of approval. These measures are also ~~also recommended for inclusion~~included in the Archtown project, ~~in the same manner as they were included in the Sanchez Hoggan project~~as shown in the City's modified MMRP, which is Exhibit 3 to this report. The air quality improvement measures are listed in Exhibit 2 to this report.

Similarly, although long response times for fire suppression are not technically a significant environmental effect requiring mitigation under CEQA, provision of ESFR systems, interagency fire protection agreements and other measures that would improve fire suppression response times are measures that would improve fire protection services in the project area. These measures, ~~as they are~~which were developed in cooperation with the City and LAFCo, ~~should be incorporated into~~are included in the project as shown in the City's modified MMRP, which is Exhibit 3 to this report..

3.0 RECOMMENDED LAFCo CEQA PROCESS

LAFCo has responsibility for CEQA compliance as a Responsible Agency in connection with its review of the Archtown annexation. LAFCo's duties as a Responsible Agency are defined in CEQA Guidelines §15096. In accordance with §15096, LAFCo must consider the Lead Agency's environmental document and use the document for its approval decision in conjunction with other available information or prepare a new CEQA document pursuant to the requirements of §15096. LAFCo is permitted to consider additional mitigation measures under §15096.

BaseCamp Environmental has prepared an evaluation of the adequacy of the CEQA IS/MND adopted in 2011 by the City of Stockton (Section 2.0) for LAFCo's use processing the project. BaseCamp's conclusions with respect to the adequacy of the document are shown in Section 2.5. BaseCamp has also considered, in Section 2.6, whether additional mitigation measures should be attached to the project pursuant to CEQA Guidelines 15096(g). On the basis of this analysis, BaseCamp's recommendations for further action by LAFCo with regard to CEQA processing of the project are provided below.

1. LAFCo should determine that the 2011 Adopted IS/MND, as supplemented by the information contained in this analysis and appendices, adequately describes the potential environmental impacts of the project and is adequate for its use in taking action on the proposed annexation. This determination would represent LAFCo's independent judgment based on the substantial evidence included in the referenced documents.

2. LAFCo should determine that preparation of a subsequent or supplemental document is not warranted under CEQA Guidelines §15162 or §15163, because there have been no substantial changes in the project, no substantial changes in the project's circumstances or new information of substantial importance that require major revisions to the adopted Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of the previously-identified significant effects.

3. LAFCo should determine that mitigation measures identified in the 2011 Adopted IS/MND remain applicable to the project, with the exception of three mitigation measures that no longer apply, which are shown as deletions in Exhibit 3, and are sufficient to reduce the potentially significant environmental effects of the project to a less than significant level and that no other mitigation measures, including those attached to other similar projects in the project vicinity, are necessary or desirable to address the significant effects of the project.

4. LAFCo should determine that feasible air quality improvement measures attached to the Sanchez Hoggan project (Exhibit 2), although unquantified and not required for the mitigation of significant air quality effects under CEQA, have the potential~~ly~~ to substantially lessen potential air quality and environmental justice effects as

highlighted by comments from state agencies on the ~~Sanchez~~ Sanchez-Hoggan EIR. ~~The project applicant has agreed to implement these additional measures.~~

5. LAFCo should determine that incorporation of an ESFR system, execution of a interagency fire services agreement and such other feasible fire protection service improvement measures identified cooperatively by LAFCo and the City, although not technically required for mitigation of significant environmental effects under CEQA, have the potentially to improve fire protection services in the project area. ~~The project applicant has agreed to implement these additional measures.~~

6. LAFCo should make the findings specified in CEQA Guidelines §15091 that, with respect to each of the potentially significant environmental impacts identified in the Mitigation Monitoring and Reporting Program (Exhibit 3), that changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effects of the project. Substantial evidence in support of each finding is provided by data and analysis in the 2011 Adopted IS/MND and in this document and ~~appendices~~attached exhibits.

7. LAFCo should adopt the 2011 Adopted IS/MND as augmented and modified by Exhibits 3 and 4 to this report - *Recommendations for Responsible Agency Action pursuant to CEQA Guidelines Section 15096 for the Archtown Industrial Project* - and direct staff to file a Notice of Determination for the project in compliance with the requirements of CEQA Guidelines §15075.

APPENDIX

CEQA GUIDELINES SECTION 15096

APPENDIX

CEQA GUIDELINES SECTION 15096. PROCESS FOR A RESPONSIBLE AGENCY

(a) General. A Responsible Agency complies with CEQA by considering the EIR or Negative Declaration prepared by the Lead Agency and by reaching its own conclusions on whether and how to approve the project involved. This section identifies the special duties a public agency will have when acting as a Responsible Agency.

(b) Response to Consultation. A Responsible Agency shall respond to consultation by the Lead Agency in order to assist the Lead Agency in preparing adequate environmental documents for the project. By this means, the Responsible Agency will ensure that the documents it will use will comply with CEQA.

> (1) In response to consultation, a Responsible Agency shall explain its reasons for recommending whether the Lead Agency should prepare an EIR or Negative Declaration for a project. Where the Responsible Agency disagrees with the Lead Agency's proposal to prepare a Negative Declaration for a project, the Responsible Agency should identify the significant environmental effects which it believes could result from the project and recommend either that an EIR be prepared or that the project be modified to eliminate the significant effects.
>
> (2) As soon as possible, but not longer than 30 days after receiving a Notice of Preparation from the Lead Agency, the Responsible Agency shall send a written reply by certified mail or any other method which provides the agency with a record showing that the notice was received. The reply shall specify the scope and content of the environmental information which would be germane to the Responsible Agency's statutory responsibilities in connection with the proposed project. The Lead Agency shall include this information in the EIR.

(c) Meetings. The Responsible Agency shall designate employees or representatives to attend meetings requested by the Lead Agency to discuss the scope and content of the EIR.

(d) Comments on Draft EIRs and Negative Declarations. A Responsible Agency should review and comment on draft EIRs and Negative Declarations for projects which the Responsible Agency would later be asked to approve. Comments should focus on any shortcomings in the EIR, the appropriateness of using a Negative Declaration, or on additional alternatives or mitigation measures which the EIR should include. The comments shall be limited to those project activities which are within the agency's area of expertise or which are required to be carried out or approved by the agency or which will be subject to the exercise of powers by the agency. Comments shall be as specific as possible and supported by either oral or written documentation.

(e) Decision on Adequacy of EIR or Negative Declaration. If a Responsible Agency believes that the final EIR or Negative Declaration prepared by the Lead Agency is not adequate for use by the Responsible Agency, the Responsible Agency must either:

(1) Take the issue to court within 30 days after the Lead Agency files a Notice of Determination;

(2) Be deemed to have waived any objection to the adequacy of the EIR or Negative Declaration;

(3) Prepare a subsequent EIR if permissible under Section 15162; or

(4) Assume the Lead Agency role as provided in Section 15052(a)(3).

(f) Consider the EIR or Negative Declaration. Prior to reaching a decision on the project, the Responsible Agency must consider the environmental effects of the project as shown in the EIR or Negative Declaration. A subsequent or supplemental EIR can be prepared only as provided in Sections 15162 or 15163.

(g) Adoption of Alternatives or Mitigation Measures.

(1) When considering alternatives and mitigation measures, a Responsible Agency is more limited than a Lead Agency. A Responsible Agency has responsibility for mitigating or avoiding only the direct or indirect environmental effects of those parts of the project which it decides to carry out, finance, or approve.

(2) When an EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment. With respect to a project which includes housing development, the Responsible Agency shall not reduce the proposed number of housing units as a mitigation measure if it determines that there is another feasible specific mitigation measure available that will provide a comparable level of mitigation.

(h) Findings. The Responsible Agency shall make the findings required by Section 15091 for each significant effect of the project and shall make the findings in Section 15093 if necessary.

(i) Notice of Determination. The Responsible Agency should file a Notice of Determination in the same manner as a Lead Agency under Section 15075 or 15094 except that the Responsible Agency does not need to state that the EIR or Negative Declaration complies with CEQA. The Responsible Agency should state that it considered the EIR or Negative Declaration as prepared by a Lead Agency.

EXHIBIT 1

MMRP COMPARISON TABLE

Exhibit 1- Comparable Mitigation Measures Summary

Impact/Category*	Adopted Mitigation Measures from the 2040 General Plan EIR	Adopted Mitigation Measures from the NorCal Logistics Center Project EIR (P12-110)	Adopted Mitigation Measures from the Sanchez-Hoggan Annexation Project EIR (P19-0691)	Adopted Mitigation Measures from the Archtown First Industrial Project MND	City Ordinances, Programs and Standards Applicable to Archtown
Aesthetics	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	**Measure 3.1.1:** Outdoor Lighting Requirements. All proposed outdoor lighting will be required to meet applicable city standards regulating outdoor lighting in order to minimize any impacts resulting from outdoor lighting on adjacent properties. Lighting and glare guidelines provided in the City of Stockton's Municipal Codes for Design and Development require that all light sources be shielded and directed downwards so as to minimize trespass light and glare to adjacent residences. Additionally, all outdoor lighting sources of 1,000 lumens or greater shall be fully shielded.	The Sanchez-Hoggan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Archtown IS/MND did not identify any significant or potentially significant impacts, or require mitigation measures, in this issue area.	Outdoor Lighting Requirements are already required during design review per the City of Stockton's Municipal Codes (Section __. The standards will be applied to the design review and building permit review of the project.
Agricultural and Forestry	**AG-1**: Prior to project approval, if a development project will convert prime farmland, farmland of statewide importance, or unique farmland to a non-agricultural use, the project applicant shall demonstrate participation in the City's agricultural conservation program, which requires either dedication of an agricultural conservation easement at a 1:1 ratio or payment of an in-lieu agricultural mitigation fee	**Measure 3.2.1**: Compensate for Loss of Agricultural Lands. The applicant will be subject to the City's Agricultural Land Mitigation Program fees. The Agricultural Land Mitigation Program applies to all projects under the jurisdiction of the City of Stockton that would result in the conversion of agricultural land to a non-agricultural use, including residential, commercial, and industrial development. The purpose of the Agricultural Land Mitigation Program is to mitigate for the loss of agricultural land in the City of Stockton through conversion to private urban uses, including residential, commercial and industrial development.	The Sanchez-Hoggan EIR was tiered to the 2040 General Plan EIR with respect to agricultural land conversion impacts. The EIR did not identify any new significant or potentially significant impacts in this issue area but noted that the project would be required to comply with the City's agricultural conservation program. No new mitigation measures were adopted with the EIR.	Like the Sanchez-Hoggan project, the Archtown IS/MND was tiered to the 2007 General Plan EIR with respect to agricultural land conversion impacts. The IS/MND did not identify any new significant or potentially significant impacts in this issue area but noted that the project would be required to comply with the City's agricultural conservation program. No new mitigation measures were adopted with the IS/MND	As required by City ordinance, Farmland Mitigation Fees are collected by the City prior to issuance of building permit. Habitat Conservation Fees are collected by the Council Of Government prior to the issuance of permit. Payment of habitat conservation fees, or provision of equivalent mitigation, is required regardless of whether a formal mitigation measure applies.
Air Quality	**AQ-1:** Implement Mitigation Measure AQ-3 to further reduce long-term criteria air pollutant emissions. **AQ-2:** Prior to issuance of any construction permits for development projects subject to California Environmental Quality Act (CEQA) review (i.e., non-exempt projects), development project applicants shall prepare and submit to the City of Stockton Planning and Engineering Division a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with San Joaquin Valley Air Pollution Control District (SJVAPCD) methodology in assessing air quality impacts. The prepared evaluation for projects that meet the SJVAPCD Small Projects Analysis Level (SPAL) screening criteria shall at minimum, identify the primary sources of construction emissions and include a discussion of the applicable SJVAPCD rules and regulations and SPAL screening criteria to support a less than significant conclusion. For projects that do not meet the SPAL screening criteria, project-related construction emissions shall be quantified. If construction-related criteria air pollutants are determined tohave the potential to exceed the SJVAPCD adopted thresholds of significance, as identified in the Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI), the City of Stockton Planning and Engineering Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities to below these thresholds. These identified measures shall be incorporated into appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning and Engineering Division. Mitigation measures to reduce construction-related emissions could include, but are not limited to: ▯ Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower. A list of construction equipment by type and model year shall be maintained by the construction contractor on-site, which shall be available for City review upon request. ▯ Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards. ▯ Use of alternative-fueled or catalyst-equipped diesel construction equipment, if available and feasible.	**Measure 3.3.1a**: Implement Dust Control Measures During Construction Activities. The applicant shall comply with Regulation VIII Rule 8011 and implement the following dust control measures during construction: x The applicant shall submit a Dust Control Plan subject to review and approval of the SJVAPCD at least 30 days prior to the start of any construction activity on a site that includes 40 acres or more of disturbed surface area. Specific control measures for construction, excavation, extraction, and other earthmoving activities required by the Valley Air District include: x All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover in order to comply with Regulation VIII's 20 percent opacity limitation. x All onsite unpaved roads and offsite unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant. x All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking. x When materials are transported offsite, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained. x All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. However, the use of blower devices is expressly forbidden, and the use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. x Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant. x Within urban areas, trackout shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday. x Any site with 150 or more vehicle trips per day shall prevent carryout and trackout. Enhanced and additional control measures for construction emissions of PM10 shall be implemented where feasible. These measures include:	Taking into account that the range of existing SJVAPCD rules and regulations would be applied to the project as a matter of course, the Sanchez-Hoggan EIR did not identify any additional significant or potentially significant impacts in this issue area.	Adopted prior to the implementation of many SJVAPCD rules and regulations, the IS/MND included extensive air quality mitigation measures that may now be superseded by those rules and regulations. **AIR-1:** The applicant shall comply with Regulation VIII Rule 8011 and implement the following control measures during construction: • The applicant shall submit a Dust Control Plan subject to review and approval of the SJVAPCD at least 30 days prior to the start of any construction activity on a site that includes 40 acres or more of disturbed surface area. Specific control measures for construction, excavation, extraction, and other earthmoving activities required by the Valley Air District include: • All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover in order to comply with Regulation VIII's 20 percent opacity limitation. • All onsite unpaved roads and offsite unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant. • All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking. • When materials are transported offsite, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained. • All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. However, the use of blower devices is expressly forbidden, and the use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. • Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant. • Within urban areas, trackout shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday.	Archtown mitigation measures are consistent with current regulatory standards and practices. Existing AQ standards would be enforced as the project requires the air district approval at the time of issuance of permits and ongoing operations.

Exhibit 1- Comparable Mitigation Measures Summary

Impact/Category*	Adopted Mitigation Measures from the 2040 General Plan EIR	Adopted Mitigation Measures from the NorCal Logistics Center Project EIR (P12-110)	Adopted Mitigation Measures from the Sanchez-Hoggan Annexation Project EIR (P19-0691)	Adopted Mitigation Measures from the Archtown First Industrial Project MND	City Ordinances, Programs and Standards Applicable to Archtown
	⍰ Clearly posted signs that require operators of trucks and construction equipment to minimize idling time (e.g., five-minute maximum). ⍰ Preparation and implementation of a fugitive dust control plan that may include the following measures: • Disturbed areas (including storage piles) that are not being actively utilized for construction purposes shall be effectively stabilized using water, chemical stabilizer/suppressant, or covered with a tarp or other suitable cover (e.g., revegetated). • On-site unpaved roads and offsite unpaved access roadsshall be effectively stabilized using water or chemical stabilizer/suppressant. • Land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled utilizing application of water or by presoaking. • Material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained when materials are transported offsite. • Operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions.) (Use of blower devices is expressly forbidden.) (Utilize electric-powered vacuums or devices to capture materials.) • Following the addition of materials to or the removal of materials from the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant. • Within urban areas, trackout shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday. • Any site with 150 or more vehicle trips per day shall prevent carryout and trackout. • Limit traffic speeds on unpaved roads to 15 mph. • Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than 1 percent. • Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area. • Adhere to Regulation VIII's 20 percent opacity limitation, as applicable. ⍰ Enter into a Voluntary Emissions Reduction Agreement (VERA) with the SJVAPCD. The VERA shall identify the amount of emissions to be reduced, in addition to the amount of funds to be paid by the project applicant to the SJVAPCD to implement emission reduction projects required for the project. **AQ-3**: Prior to discretionary approval by the City of Stockton for development projects subject to California Environmental Quality Act (CEQA) review (i.e., non-exempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation phase-related air quality impacts to the City of Stockton Planning and Engineering Division for review and approval. The evaluation shall be prepared in conformance with San Joaquin Air Pollution Control District (SJVAPCD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the SJVAPCD-adopted thresholds of significance, as identified in the Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI), the City of Stockton Planning and Engineering Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the	x Limit traffic speeds on unpaved roads to 15 mph. x Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent. x Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site. x Install wind breaks at windward side(s) of construction areas. x Suspend excavation and grading activity when winds exceed 20 mph. x Limit area subject to excavation, grading, and other construction activity at any one time. **Measure 3.3.1b:** Implement Construction-Related Exhaust Emission Reducing Measures. The applicant shall implement control measures during construction to mitigate exhaust emissions from construction equipment. x Contractor shall keep all diesel equipment tuned and maintained. x Use alternative fueled or catalyst equipped diesel construction equipment where feasible. x Minimize idling time to a maximum of 5 minutes. x Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set), where feasible. x Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak-hour of vehicular traffic on adjacent roadways. x Implement activity management, such as rescheduling activities to reduce short-term impacts and limiting the hours of operation of heavy duty equipment and/or the amount of equipment in use. Measure 3.3.1c: Implement Construction-Related Exhaust Emission Reducing Measures Consistent with Rule 9510 Indirect Source Review. As part of future site development, the applicant shall comply with Rule 9510 Indirect Source Review. Compliance with Rule 9510 would require reductions of 20% of the NOx construction emissions and 45% of the PM10 construction exhaust emissions. If onsite (construction fleet) reductions are insufficient to meet these reduction targets, the applicant shall pay mitigation fees of $9,350/ton for NOx emissions for year 2008 and beyond, and $9,011/ton for PM10 emissions for year 2008 and beyond. **Measure 3.3.2a:** Implement Operation-Related Exhaust Emission Reducing Measures Consistent with Rule 9510 Indirect Source Review. As part of future site development, the applicant shall comply with Rule 9510 Indirect Source Review. Compliance with Rule 9510 will require reductions of 33.3% of the NOx operational emissions and 50% of the PM10 operational emissions. These reductions shall be accomplished through onsite and offsite measures, and/or through the payment of mitigation fees of $9,350/ton for NOx emissions for year 2008 and beyond, and $9,011/ton for PM10 emissions for year 2008 and beyond. Measure 3.3.2b: Interior and Exterior Coatings. As part of future site development, the applicant shall require the use of low VOC paints for interior and exterior coatings.		Any site with 150 or more vehicle trips per day shall prevent carryout and trackout. Enhanced and additional control measures for construction emissions of PM10 shall be implemented where feasible. These measures include: Limit traffic speeds on unpaved roads to 15 mph. • Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent. • Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site. • Install wind breaks at windward side(s) of construction areas. • Suspend excavation and grading activity when winds exceed 20 mph. • Limit area subject to excavation, grading, and other construction activity at any one time. **AIR-2:** The applicant shall implement control measures during construction to mitigate NOx and ROG emissions from construction equipment. • Contractor shall keep all diesel equipment tuned and maintained. • Use alternative fueled or catalyst equipped diesel construction equipment where feasible. • Minimize idling time to a maximum of 5 minutes. • Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set), where feasible. • Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak-hour of vehicular traffic on adjacent roadways. • Implement activity management, such as rescheduling activities to reduce short-term impacts and limiting the hours of operation of heavy duty equipment and/or the amount of equipment in use. **AIR-3:** Implementation Plans prepared by the applicant, and subsequent development projects, shall comply with Rule 9510 Indirect Source Review. Compliance with Rule 9510 would require reductions of 20% of the NOx construction emissions and 45% of the PM10 construction exhaust emissions. In addition, Compliance with Rule 9510 will require reductions of 33.3% of the NOx operational emissions and 50% of the PM10 construction emissions. Any excess emissions above the SJVAPCD threshold shall require mitigation fees (currently $9,350/ton for NOx emissions for year 2008 and beyond, and $9,011/ton for PM10 emissions for year 2008 and beyond) to achieve NOx and/or PM10 reductions from other sources in the air district. **AIR-4:** The applicant shall require implementation of all feasible energy efficiency and GHG reduction measures, including but not limited to the following: <u>Energy Efficiency</u> • Design buildings to be energy efficient. Site buildings will take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use. • Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings. • Install light colored "cool" roofs, cool pavements, and strategically placed shade trees. • Provide information on energy management services for large energy users.	

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	conditions of approval. Possible mitigation measures to reduce long-term emissions can include, but are not limited to the following: • For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions. • Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use. • Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with Section 2485 of 13 CCR Chapter 10. • Provide changing/shower facilities as specified, at minimum, or greater than in the guidelines in Section A5.106.4.3 of the CALGreen Code (Nonresidential Voluntary Measures). • Provide bicycle parking facilities equivalent to or greater than as specified in Section A4.106.9 (Residential Voluntary Measures) of the CALGreen Code. • Provide preferential parking spaces for low-emitting, fuelefficient, and carpool/van vehicles equivalent to or greater than Section A5.106.5.1 of the CALGreen Code (Nonresidential Voluntary Measures). • Provide facilities to support electric charging stations per Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A5.106.8.2 (Residential Voluntary Measures) of the CALGreen Code. • Applicant-provided appliances shall be Energy Star-certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star-certified or equivalent appliances shall be verified by Building & Safety during plan check. • Applicants for future development projects along existing and planned transit routes shall coordinate with the City Stockton and San Joaquin Regional Transit District to ensure that bus pad and shelter improvements are incorporated, as appropriate, and that these transit improvements consider and implement design features (e.g., pullout lanes for buses) to avoid or reduce impediment/queuing of vehicles. • Applicants for future development projects shall enter into a Voluntary Emissions Reduction Agreement (VERA) with the San Joaquin Valley Air Pollution Control District (SJVAPCD). The VERA shall identify the amount of emissions to be reduced, in addition to the amount of funds to be paid by the project applicant to the SJVAPCD to implement emission reduction projects required for the project. **AQ-4a**: Implement Mitigation Measures AQ-2 and AQ-3 to further reduce construction and operation-related criteria air pollutant emissions. **AQ-4b**: Prior to discretionary approval, applicants for development projects that are subject to the California Environmental Quality Act (CEQA) shall assess their projects to the San Joaquin Valley Air Pollution Control District's (SJVAPCD) Rule 9510 Applicability Thresholds as follows: • 50 residential units; • 2,000 square feet of commercial space; • 25,000 square feet of light industrial space; • 100,000 square feet of heavy industrial space; • 20,000 square feet of medical office space; • 39,000 square feet of general office space;			• Install energy efficient heating and cooling systems, appliances and equipment, and control systems. • Install light emitting diodes (LEDs) for street and other outdoor lighting. • Limit the hours of operation of outdoor lighting where not required for security. • Provide education on energy efficiency. <u>Renewable Energy</u> • Install solar and wind power systems, solar and tankless hot water heaters, and energy-efficient heating ventilation and air conditioning. Educate consumers about existing incentives. • Use combined heat and power in appropriate applications. <u>Water Conservation and Efficiency</u> • Create water-efficient landscapes. • Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls. • Use reclaimed water for landscape irrigation in new developments and on public property. Install the infrastructure to deliver and use reclaimed water. • Design buildings to be water-efficient. Install water-efficient fixtures and appliances. Solid Waste Measures • Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). • Provide interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas. • Provide education and publicity about reducing waste and available recycling services. Transportation and Motor Vehicles • Limit idling time for commercial vehicles, including delivery and construction vehicles. • Use low or zero-emission vehicles, including construction vehicles. • Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride sharing vehicles, and providing a web site or message board for coordinating rides. • Provide information on all options for individuals and businesses to reduce transportation-related emissions. Provide education and information about public transportation.	

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	9,000 square feet of education space; 10,000 square feet of government space; 20,000 square feet of recreational space; or 9,000 square feet of space not identified above. Applicants for development projects subject to CEQA that do not meet the SJVAPCD Rule 9510 Applicability Thresholds shall assess whether project-related construction and operational emissions exceed the SJVAPCD 100 pounds per day ambient air quality screening threshold. Applicants for development projects that exceed this ambient air quality screening threshold shall prepare or have prepared an ambient air quality analysis, consistent with the SJVAPCD Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI), to assess whether the subject development project would cause or contribute to a violation of any California Ambient Air Quality Standard or National Ambient Air Quality Standard. The ambient air quality analysis shall identify measures to reduce impacts as necessary. Recommended measures may include those identified in Mitigation Measures AQ-2 and AQ-3. The related recommendations of the ambient air quality analysis shall be incorporated into all construction management and design plans and which shall be submitted to the City and verified by the City's Planning and Engineering Division. **AQ-5:** Prior to discretionary project approval, applicants for industrial or warehousing land uses in addition to commercial land uses that would generate substantial diesel truck travel (i.e., 100 diesel trucks per day or 40 or more trucks with dieselpowered transport refrigeration units per day based on the California Air Resources Board recommendations for siting new sensitive land uses), shall contact the San Joaquin Valley Air Pollution Control District (SJVAPCD) or the City of Stockton in conjunction with the SJVAPCD to determine the appropriate level of health risk assessment (HRA) required. If preparation of an HRA is required, all HRAs shall be submitted to the City of Stockton and the SJVAPCD for evaluation. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the SJVAPCD. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06) or the risk thresholds in effect at the time a project is considered, or that the appropriate noncancer hazard index exceeds 1.0 or the thresholds as determined by the SJVAPCD at the time a project is considered, the applicant will be required to identify and demonstrate that measures are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. Measures to reduce risk impacts may include but are not limited to: Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible. Electrifying warehousing docks. Requiring use of newer equipment and/or vehicles. Restricting offsite truck travel through the creation of truck routes. Measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed project. **AQ-6:** Prior to project approval, if it is determined during project-level environmental review that a project has the potential to emit nuisance odors beyond the property line, an odor management plan shall be prepared and submitted by the project applicant prior to project approval to ensure				

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	compliance with San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 4102. The following facilities that are within the buffer distances specified from sensitive receptors (in parentheses) have the potential to generate substantial odors: Wastewater Treatment Plan (2 miles) Sanitary Landfill (1 mile) Transfer Station (1 mile) Composting Facility (1 mile) Petroleum Refinery (2 miles) Asphalt Batch Plan (1 mile) Chemical Manufacturing (1 mile) Fiberglass Manufacturing (1 mile) Painting/Coating Operations (1 mile) Food Processing Facility (1 mile) Feed Lot/ Dairy (1 mile) Rendering Plant (1 mile) The Odor Management Plan prepared for these facilities shall identify control technologies that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. Control technologies may include but are not limited to scrubbers (e.g., air pollution control devices) at an industrial facility. Control technologies identified in the odor management plan shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.				
Biological Resources	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area. Biological resource protections, including participation in the SJMSCP, are required as a matter of policy.	**Measure 3.4.1:** Nesting Raptor Protection Measures. To avoid and minimize impacts on treenesting raptors the following measures (consistent with the SJMSCP 2009 ITMMs) will be implemented: x If feasible, conduct all tree and shrub removal and grading activities during the non-breeding season (generally from October through February). x If grading and tree removal activities are scheduled to occur during the breeding season (generally from March through September), pre-construction surveys for Swainson's hawks and other tree-nesting raptors. The surveys shall be conducted by a qualified biologist in suitable nesting habitat within 1,000 feet of the project site for tree nesting raptors prior to project activities that will occur between March 15 and September 15 of any given year. If active nests are recorded within these buffers the project proponent shall consult with CDFW to determine and implement appropriate avoidance and mitigation measures. x If known or potential Swainson's hawk nest trees (i.e., trees that hawks are known to have nested in within the past three years or trees, such as large oaks, which the hawks prefer for nesting) are located on the project site, the project applicant has the option of retaining or removing known or potential nest trees (according to Section 5.2.4.11 of the SJMSCP).	**BIO-1:** The developer shall apply to the San Joaquin Council of Governments (SJCOG) for coverage under the San Joaquin County Multi-Species Open Space and Habitat Conservation Plan (SJMSCP). The project site shall be inspected by the SJMSCP biologist, who will recommend which Incidental Take Minimization Measures (ITMMs) set forth in the SJMSCP should be implemented. The project applicant shall pay the required SJMSCP fee, if any, and be responsible for the implementation of the specified ITMMs. BIO-2 Prior to issuance of City permits for the proposed pump station and outfall, the project applicant shall delineate wetland areas, obtain required federal and state permits and demonstrate that the project would result in "no net loss" of wetlands and/or Waters of the U.S. Wetland mitigation necessary to make this demonstration shall be included in the project or project conditions of approval. BIO-3: If vegetation removal or construction commences during the general avian nesting season (February 1 through September 15), a pre-construction survey for all species of nesting birds is recommended. If active nests are found, work in the vicinity of the nests shall be delayed until the young have fledged. BIO-4: Project development on the Hoggan property (APN 179-200-27) shall avoid removal of existing oak trees to the extent feasible. If removal of oak trees is required, a certified arborist shall survey the oak trees proposed for removal to determine if they are Heritage Trees as defined in Stockton Municipal Code Chapter 16.130. The arborist report with its findings shall be submitted to the City's Community Development Department. If Heritage Trees are determined to exist on the property, removal of any such tree shall require a permit to be issued by the City in accordance with Stockton Municipal Code Chapter 16.130. The permittee shall comply with all permit conditions, including tree replacement.	The IS/MND included extensive biological resource mitigation measures that are now superseded by participation in the SJMSCP. **BIO-1a**: Prior to initiating any phase of the proposed project, a special-status plant survey shall be conducted by a JPA biologist to determine if rose-mallow, Mason's lilaeopsis, or Sanford's arrowhead occur within Weber Slough. The survey shall consist of at least two separate visits between the months of April to November. If special-status plants species are discovered during the survey, Mitigation Measure BIO-1b shall be implemented. BIO-1b: For areas where the JPA has identified special-status plants, the SJMSCP requires the following: I. Complete avoidance of plant populations on site is required for the following plant species in accordance with the identified measures in Section 5.5.9(F): Large flowered fiddleneck, succulent owl's clover, legenere, Greene's tuctoria, diamond-petaled poppy, Sanford's arrowhead, Hospital Canyon larkspur, showy madia, Delta button celery, Slough thistle. II. If one of the following SJMSCP Covered Plant Species is identified by the JPA on a project site, the following mitigation measures are required: A. For widely distributed plant species: Mason's lilaeopsis, California hibiscus, Suisun marsh aster, Delta tule pea, Delta mudwort: i. Attempt acquisition. If the plant population is considered healthy by the JPA with the concurrence of the Permitting Agencies' representatives on the TAC, then the parcel owner shall be approached to consider selling a conservation easement including a buffer area as prescribed in Section 5.4.4 and sufficient to maintain the hydrological needs of the plants. Alternatively, the landowner may be approached to consider land dedication in-lieu of paying SJMSCP development fees. If the Project Proponent is not agreeable to acquisition, then compensation shall be prescribed as specified in Section 5.3.1 of the SJMSCP. BIO-2: Giant garter snake For areas identified as potential giant garter snake habitat, the SJMSCP requires the following: • Construction shall occur during the active period for the snake, between May 1 and October 1. Between October	Participation in the SJMSCP is ordinarily required by the City for new development and evidence of participation is required prior to approval of grading activities. SJMSCP participation is required regardless of a formal mitigation measure. In lieu of SJMSCP participation, an applicant must formally opt out of the SJMSCP and provide equivalent mitigation.

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				2nd and April 30th, the JPA, with the concurrence of the Permitting Agencies' representatives of the TAC, shall determine if additional measures are necessary to minimize and avoid take. • Vegetation clearing shall be limited within 200-feet of the of potential giant garter snake aquatic habitat to the minimal area necessary unless otherwise approved by the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) Technical Advisory Committee (TAC). • When and if required, the work areas within Weber Slough shall be dewatered and kept dry for at least 15 days prior to the start of construction. The official start of the 15 day count will be dictated by a qualified wildlife biologist to ensure the habitat has been adequately dewatered and remains dry for the entire 15 day period. Once construction in these areas has begun, the area will remain disturbed until construction is complete. If construction activities are idle for more than two days, construction will be delayed until the completion of another 15 day count. • Movement of heavy equipment within 200-feet of the banks of potential giant garter snake aquatic habitat shall be confined to existing roadways to minimize habitat disturbance. • Prior to ground disturbance, all on-site construction personnel shall be given instruction regarding the presence of SJMSCP Covered Species and the importance of avoiding impacts to these species and their habitats. • In areas where wetlands, irrigation ditches, marsh areas or other potential giant garter snake habitats are being retained on the site: • Temporary fencing shall be installed at the edge of the construction area and the adjacent wetland, marsh, or ditch; • Working areas, spoils, and equipment storage and other project activities shall be restricted to areas located outside of marshes, wetlands, and ditches; and • Hay bales, filter fences, vegetative buffer strips, or other accepted equivalents shall be employed to maintain water quality and limit construction runoff into wetland areas. • Pre-construction surveys for the giant garter snake (conducted after completion of environmental reviews and prior to ground disturbance) shall occur within 24-hours of ground disturbance. BIO-3: Burrowing owl At least 14 but no more than 30 days prior to ground disturbing activities, a pre-construction survey for burrowing owls shall be conducted per SJMSCP Incidental Take and Minimization Measure 5.2.4.15. If no owls are found, no further action is necessary. If owls are found: During the non-breeding season (September 1 through January 31) burrowing owls occupying the project site shall be evicted from the project site by passive relocation as described in the California Department of Fish and Game's Staff Report on Burrowing Owls (Sept., 1995) During the breeding season (February 1 through August 31) occupied burrows shall not be disturbed and shall be provided with a 75-meter protective buffer until and unless the Technical Advisory Committee (TAC), with the concurrence of the Permitting Agencies' representatives on the TAC; or unless a qualified biologist approved by the Permitting Agencies verifies through non-invasive means that either: 1) the birds have not begun egg laying, or 2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. Once the fledglings are capable of independent survival, the burrow can be destroyed.	

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				Project Applicant Planning Department Prior to building permit BIO-4: Swainson's hawk Because the project site is located less than one mile from a Swainson's hawk nest that has been active within the last five years, the following Incidental Take Minimization Measure as stated in the SJMSCP shall be implemented during construction activities: • If a nest tree becomes occupied during construction activities, then all construction activities shall remain a distance of two times the drip line of the tree, measured from the nest. • If the Project Proponent elects to remove a nest tree, then nest trees may be removed between September 1 and February 15, when the nests are unoccupied. If potential nest sites are found: During the non-breeding season (August 1 through March 19) and potential nest tree is retained, tree should be monitored throughout breeding season to assess if Swainson's hawks occupy the nest. If the nest becomes active during the breeding season then the During the breeding season conditions must be met. During the breeding season (March 20 through July 31) nest shall be verified as a Swainson's hawk nest by a qualified biologist. Once the nest is verified by non-invasive means, it shall not be disturbed and construction activities must occur outside of a buffer of two times the dripline of the tree, measured from the nest. BIO-5a: For impacts to riparian habitat, the following SJMSCP requirements shall be followed: • Require appropriate erosion control measures (e.g., hay bales, filter fences, vegetative buffer strips or other accepted equivalents) to reduce siltation and contaminated runoff from project sties. • Retain emergent (rising out of water) and submergent (covered by water) vegetation. • Retain vegetation as practical within the constraints of the proposed development as determined by the JPA with the concurrence of the Permitting Agencies' representatives on the TAC. Rapidly sprouting plants, such as willows, should be cut off at the ground line and root systems left in tact, when removal is necessary. • Locate roadways and other facilities perpendicular, rather than adjacent, to waterways to reduce the total riparian area disturbed wherever practical within the constraints of the proposed development as determined by the JPA with the concurrence of the Permitting Agencies' representatives on the TAC. • Provide construction buffers of at least 100-feet throughout the construction process. This buffer area should be marked with stakes, fencing or other materials which will be visible to construction workers, including heavy equipment operators. This buffer may be reduced on a case-by-case basis by the JPA with the concurrence of the Permitting Agencies' representatives on the TAC. BIO-5b: A Section 1602 Streambed Alteration Agreement (SAA) from CDFG shall be obtained prior to the onset of construction related activities for the removal of riparian vegetation and/or alteration of the streambed within Weber Slough. The project applicant shall abide by the conditions of the SAA. Project Applicant Planning Department Prior to building permit BIO-6a: Prior to initiating any phase of the proposed project, a formal wetland delineation in areas along Weber	

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				Slough shall be conducted. This assessment shall be conducted by a wetland specialist trained in the delineation of wetlands according to methods accepted by the USACE. It is recommended that the assessment occur no more than two years prior to the start of mining operations in that phase since wetland delineations are generally only considered valid for two to five years. This timing is to attempt to ensure that site conditions do not change between the delineation and the start of site development. This assessment shall, at a minimum, include the identification and mapping of any wetland vegetation and a description of hydrologic flows into and out of areas with wetland vegetation. If potentially jurisdictional wetlands occur in areas affected by the project, a wetland delineation report shall be prepared and submitted to the USACE for verification. Project Applicant Planning Department Prior to building permit BIO-6b: As project activities would impact Weber Slough, a Waters of the US, the applicant shall be required to obtain a Section 404 (Clean Water Act) permit from the USACE and a Section 401 permit from the RWQCB prior to the onset of construction related activities. The project applicant shall avoid or reduce such impacts to the maximum extent possible and mitigate the loss of wetlands as a result of the proposed project by complying with the USACE "no net loss" policy (e.g., purchasing mitigation credits for created wetlands at a USACE-approved wetland mitigation bank at no less than a 1:1 ratio). The project applicant shall abide by the conditions of the Section 404 and 401 permit. Project Applicant Planning Department Prior to building permit BIO-7: It is anticipated that the Arch Road Industrial Project would be approved for participation in the SJMSCP. Compliance with the SJMSCP would provide for impact avoidance measures (e.g., pre-construction surveys during appropriate seasons for identification, construction set-backs, restriction on construction timing) and mitigation for loss of habitat for all species that may be affected by this impact. Impact avoidance measures would include, but are not limited to, the species-specific measure presented above (BIO-1, BIO-2, BIO-3, BIO-4 and BIO-5a). Additionally, an in-lieu fee of $13,022 per acre impacted (since habitat is designated as Agriculture under the SJMSCP) will be required. If construction of Arch Road Industrial Project is not approved for participation in the SJMSCP, then the project proponent shall obtain the necessary individual permits and shall conduct the pre-construction surveys and avoidance and minimization measure required in those permits, which are expected to be consistent with the SJMSCP. Should pre-construction surveys find that habitat is occupied for any of the covered species, the project proponent shall implement avoidance and minimization measures using performance criteria consistent with those found in the SJMSCP, prepare reports documenting the surveys and avoidance and minimization measures which shall be submitted for review to the appropriate regulatory agency (CDFG or USFWS).	
Cultural Resources	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area. Cultural resource protections are required as a matter of policy.	**Measure 3.5.1a**: Stop Work in the Event of Cultural Resource Discovery. If cultural resources are encountered, all activity in the vicinity of the find shall cease until it can be evaluated by a qualified archaeologist and a Native American representative. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil	**CULT-1:** Prior to construction, construction personnel shall receive brief "tailgate" training by a qualified archaeologist in the identification of buried cultural resources, including human remains, and protocol for notification should such resources be discovered during construction work. A Yokuts tribal representative shall be invited to this training to provide information on potential tribal cultural resources.	**CUL-1:** Monitoring by a qualified archaeologist and Native American representative during excavation activities. Prior to issuance of a grading permit, an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology shall be retained by the applicant to monitor all excavation activities, including mass grading and excavation for building footings, etc. . The duration and timing of	

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		("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. If the archaeologist and Native American representative determine that the resources may be significant, they will notify the City of Stockton. An appropriate treatment plan for the resources should be developed. The archaeologist shall consult with Native American representatives in determining appropriate treatment for prehistoric or Native American cultural resources. In considering any suggested mitigation proposed by the archaeologist and Native American representative, the City will determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) will be instituted. Work may proceed in other parts of the project area while mitigation for cultural resources is being carried out. **Measure 3.5.1b**: Discovery of Human Remains. If human remains are encountered unexpectedly during construction excavation and grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the San Joaquin County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC will then identify the person(s) thought to be the Most Likely Descendent, who will help determine what course of action should be taken in dealing with the remains.	CULT-2: If any subsurface historical or archaeological, resources, including human burials and associated funerary objects, are encountered during construction, all construction activities within a 50-foot radius of the encounter shall be immediately halted until a qualified archaeologist can examine these materials, initially evaluate their significance and, if potentially significant, recommend measures on the disposition of the resource. The City shall be immediately notified in the event of a discovery, and if burial resources or tribal cultural resources are discovered, the City shall notify the appropriate Native American representatives. The contractor shall be responsible for retaining qualified professionals, implementing recommended mitigation measures and documenting mitigation efforts in written reports to the City. CULT-3: If tribal cultural resources other than human remains and associated funerary objects are encountered, the City shall be immediately notified of the find, and the City shall notify the Yokuts tribal representative. The qualified archaeologist and tribal representative shall examine the materials and determine their "uniqueness" or significance as tribal cultural resources and shall recommend mitigation measures needed to reduce potential cultural resource effects to a level that is less than significant in a written report to the City, with a copy to the Yokuts tribal representative. The City will be responsible for implementing the report recommendations. Avoidance is the preferred means of disposition of tribal cultural resources. **CULT-4:** If project construction encounters evidence of human burial or scattered human remains, the contractor shall immediately notify the County Coroner and the City, which shall in turn notify the Yokuts tribal representative. The City shall notify other federal and State agencies as required. The City will be responsible for compliance with the requirements of California Health and Safety Code Section 7050.5 and with any direction provided by the County Coroner. If the human remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission, which will notify and appoint a Most Likely Descendant. The Most Likely Descendant will work with the archaeologist to decide the proper treatment of the human remains and any associated funerary objects in accordance with California Public Resources Code Sections 5097.98 and 5097.991. Avoidance is the preferred means of disposition of the burial resources.	monitoring shall be determined by the qualified archaeologist in consultation with the applicant and the City and based on the grading plans. In the event that cultural resources are unearthed during excavation activities, the archaeological monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of the find so that the find can be evaluated. Due to the sensitivity of the project area for Native American resources, at least one Native American monitor shall also monitor all excavation activities in the project area. Selection of monitors shall be made by agreement of the Native American groups identified by the Native American Heritage Commission as having affiliation with the project area. **CUL-2:** Cease Work if Prehistoric, Historic or Paleontological Subsurface Cultural Resources are Discovered During Ground-Disturbing Activities. If cultural resources are encountered, all activity in the vicinity of the find shall cease until it can be evaluated by the archaeological monitor. If the archaeological monitor determines that the resources may be significant, the archaeological monitor will notify the Applicant and the City and will develop an appropriate treatment plan for the resources. The archaeologist shall consult with Native American monitors or other appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources if the resources are prehistoric or Native American in nature. In considering any suggested mitigation proposed by the archaeologist in order to mitigate impacts to cultural resources, the project proponent will determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) will be instituted. Work may proceed on other parts of the project site while mitigation for cultural resources is being carried out. CUL-3: Halt Work if Human Skeletal Remains are Identified During Construction. If human skeletal remains are uncovered during project construction, the project proponent (depending upon the project component) will immediately halt work, contact the San Joaquin County coroner to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.5 (e)(1) of the CEQA Guidelines. If the County coroner determines that the remains are Native American, the project proponent will contact the NAHC, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). Per Public Resources Code 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section (PRC 5097.98), with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.	
Geology/Soils	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area. Geological and soil resource protections are required as a matter of policy.	Measure 3.7.1: Conduct Geotechnical Study and Implement Design Recommendations. The applicant shall conduct a design-level geotechnical investigation of the project site to identify the characteristics of project site soils. Recommendations identified by the geotechnical investigations shall be incorporated into the design of the proposed project structures prior to approval of the	GEO-1: Prior to site development plan approval, a site-specific, design-level geotechnical study shall be completed for the proposed construction areas. The study shall include an evaluation of potential geologic and soil hazards, including the presence of expansive soils. The study shall recommend design and construction features to reduce the potential impact of identified hazards on the proposed development if the hazard is considered significant. The recommendations included in the study shall be	The IS/MND did not identify mitigation measures in this area of concern.	Design-level geotechnical studies of new development projects are required by the City prior to issuance of building permit regardless of a formal mitigation measure. The site does not have a significant grade, environmental or seismic issues that would warrant preliminary review.

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		building permit. Due to the expansive and corrosive nature of the soils, the geotechnical report may include recommendations for foundation design and use of materials that would not be affected by the corrosive soils, the removal of the expansive soils, or mixing the expansive soil with a non-expansive material.	incorporated in design and construction documents and implemented during development. GEO-2: If any subsurface paleontological resources are encountered during construction, all construction activities within a 50-foot radius of the encounter shall be immediately halted until a qualified paleontologist can examine these materials, initially evaluate their significance and, if potentially significant, recommend measures on the disposition of the resource. The City shall be immediately notified in the event of a discovery. The contractor shall be responsible for retaining qualified professionals, implementing recommended mitigation measures and documenting mitigation efforts in written reports to the City.		
Greenhouse Gas Emissions (Climate Change)	GHG-1: Within 24 months of adoption of the proposed General Plan, the City of Stockton shall proceed to adoption hearings for an update to its Climate Action Plan (CAP). The CAP shall provide: ▯ GHG inventories of existing and 2030 GHG levels; ▯ Targets for 2030 from land uses under the City's jurisdiction based on the goals of SB 32; and ▯ Tools and strategies for reducing GHG emissions in accordance with the 2030 goals of the CAP. The City shall consider the following GHG reduction measures in its CAP Update: ▯ Reevaluate the City's current green building requirements (Stockton Municipal Code Chapter 15.72, Green Building Standards) every five years to consider additional requirements for substantial new residential and nonresidential development to ensure that new development achieves a performance objective consistent with the best performing (top 25 percent) of city green building measures in the state. ▯ Require financing and/or installing energy-saving retrofits on existing structures as potential mitigation measures fordiscretionary projects that have significant GHG impacts as part of the CEQA process. ▯ Utilize transfer of development rights and other mechanisms, such as an infill mitigation bank, to enhance the viability of development in the Greater Downtown. ▯ Establish a goal for 15 percent of existing development to install solar panels over carports. ▯ Establish a goal to achieve 10 percent of non-residential electricity and 5 percent of residential electricity entirely by solar. ▯ Offer incentives for contractors that use electric equipment when bidding on City contracts. ▯ Limit non-essential idling of large construction equipment to no more than 3 minutes. In addition, to implement the CAP, the City shall develop key ordinances, programs, and policies required to promote voluntary, incentive- based measures in the CAP, establish the planning framework for the performance-based development review process, and support and implement the local mandatory GHG reduction measures. These implementation tasks include: ▯ Update the community GHG inventory to monitor emissions trends every five years. ▯ In 2030, develop a plan for post-2030 actions. ▯ Appoint an Implementation Coordinator to oversee the successful implementation of all selected GHG reduction strategies. The primary function of the Implementation Coordinator will be to create a streamlined approach to manage implementation of the CAP. The Implementation Coordinator will also coordinate periodic community outreach to leverage community involvement, interest, and perspectives.	Measure 3.6.1: Implement Construction-Related GHG Reduction Measures. The applicant shall require implementation of all feasible GHG reduction measures during construction, including but not limited to the following: x Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard); x Limit idling time for commercial vehicles, including delivery and construction vehicles; and x Use low or zero-emission vehicles, including construction vehicles. Measure 3.6.2: Implement Operation-Related GHG Reduction and Energy Efficiency Measures. The applicant shall require implementation of all feasible energy efficiency and GHG reduction measures during operations, including but not limited to the following: On-site Mitigation x Exceed Title 24 (15% improvement); x Install high-efficiency lighting (25% lighting energy reduction); x Install low-flow bathroom faucets (32% reduction in flow); x Install low-flow kitchen faucets (18% reduction in flow); x Install low-flow toilets (20% reduction in flow); x Install low-flow showers (20% reduction in flow); x Use water-efficient irrigation systems (6.1% reduction in flow); and x Institute recycling and composting services (20% reduction in waste disposed).	GHG-1: The project shall implement the Off-Road Vehicles Best Management Practices specified in the Stockton Climate Action Plan. At least three (3) percent of the construction vehicle and equipment fleet shall be powered by electricity. Construction equipment and vehicles shall not idle their engines for longer than three (3) minutes. HAZ-1: The applicant shall conduct limited soil testing along sections of Arch Road and Austin Road for the presence of lead-based compounds that exceed state health standards and take precautions as needed to prevent exposure of construction workers or the public from any associated health risks.	The IS/MND included the following GHG-related mitigation measures in the Air Quality section: Adopted prior to the implementation of many SJVAPCD rules and regulations, the IS/MND included extensive air quality mitigation measures that may now be superseded by those rules and regulations. **AIR-1:** The applicant shall comply with Regulation VIII Rule 8011 and implement the following control measures during construction: • The applicant shall submit a Dust Control Plan subject to review and approval of the SJVAPCD at least 30 days prior to the start of any construction activity on a site that includes 40 acres or more of disturbed surface area. Specific control measures for construction, excavation, extraction, and other earthmoving activities required by the Valley Air District include: • All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover in order to comply with Regulation VIII's 20 percent opacity limitation. • All onsite unpaved roads and offsite unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant. • All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking. • When materials are transported offsite, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained. • All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. However, the use of blower devices is expressly forbidden, and the use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. • Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant. • Within urban areas, trackout shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday. Any site with 150 or more vehicle trips per day shall prevent carryout and trackout. Enhanced and additional control measures for construction emissions of PM10 shall be implemented where feasible. These measures include: Limit traffic speeds on unpaved roads to 15 mph.	The BaseCamp CEQA Adequacy Analysis (2020) found that the annexation and prezone would not result in a significant effect in this area of concern. City implementation of its adopted Climate Action Plan requires a range of energy conservation, water efficiency standards to new development.

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				• Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent. • Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site. • Install wind breaks at windward side(s) of construction areas. • Suspend excavation and grading activity when winds exceed 20 mph. • Limit area subject to excavation, grading, and other construction activity at any one time. **AIR-2:** The applicant shall implement control measures during construction to mitigate NOx and ROG emissions from construction equipment. • Contractor shall keep all diesel equipment tuned and maintained. • Use alternative fueled or catalyst equipped diesel construction equipment where feasible. • Minimize idling time to a maximum of 5 minutes. • Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set), where feasible. • Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak-hour of vehicular traffic on adjacent roadways. • Implement activity management, such as rescheduling activities to reduce short-term impacts and limiting the hours of operation of heavy duty equipment and/or the amount of equipment in use. **AIR-3:** Implementation Plans prepared by the applicant, and subsequent development projects, shall comply with Rule 9510 Indirect Source Review. Compliance with Rule 9510 would require reductions of 20% of the NOx construction emissions and 45% of the PM10 construction exhaust emissions. In addition, Compliance with Rule 9510 will require reductions of 33.3% of the NOx operational emissions and 50% of the PM10 construction emissions. Any excess emissions above the SJVAPCD threshold shall require mitigation fees (currently $9,350/ton for NOx emissions for year 2008 and beyond, and $9,011/ton for PM10 emissions for year 2008 and beyond) to achieve NOx and/or PM10 reductions from other sources in the air district. **AIR-4:** The applicant shall require implementation of all feasible energy efficiency and GHG reduction measures, including but not limited to the following: <u>Energy Efficiency</u> • Design buildings to be energy efficient. Site buildings will take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use. • Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings. • Install light colored “cool” roofs, cool pavements, and strategically placed shade trees. • Provide information on energy management services for large energy users. • Install energy efficient heating and cooling systems, appliances and equipment, and control systems. • Install light emitting diodes (LEDs) for street and other outdoor lighting. • Limit the hours of operation of outdoor lighting where not required for security. • Provide education on energy efficiency.	

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				Renewable Energy • Install solar and wind power systems, solar and tankless hot water heaters, and energy-efficient heating ventilation and air conditioning. Educate consumers about existing incentives. • Use combined heat and power in appropriate applications. Water Conservation and Efficiency • Create water-efficient landscapes. • Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls. • Use reclaimed water for landscape irrigation in new developments and on public property. Install the infrastructure to deliver and use reclaimed water. • Design buildings to be water-efficient. Install water-efficient fixtures and appliances. Solid Waste Measures • Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). • Provide interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas. • Provide education and publicity about reducing waste and available recycling services. Transportation and Motor Vehicles • Limit idling time for commercial vehicles, including delivery and construction vehicles. • Use low or zero-emission vehicles, including construction vehicles. • Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride sharing vehicles, and providing a web site or message board for coordinating rides. • Provide information on all options for individuals and businesses to reduce transportation-related emissions. Provide education and information about public transportation.	
Hazards and Hazardous Materials	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	None adopted	**HAZ-1:** The applicant shall conduct limited soil testing along sections of Arch Road and Austin Road for the presence of lead-based compounds that exceed state health standards and take precautions as needed to prevent exposure of construction workers or the public from any associated health risks.		The site in undeveloped and does not propose hazardous materials onsite. Any request to store materials would require review by the Fire department and require an onsite emergency preparedness plan.
Hydrology / Water Quality	**HYDRO-5:** Complete a citywide storm drainage master plan, including hydrologic and hydraulic models for existing land use conditions and for the land uses anticipated in 2040 under the proposed General Plan. The master plan should identify the future stormwater infrastructure needs and develop a current stormwater capital improvement plan. As part of this process, identify areas that have constraints, prioritize watersheds to be modeled, and evaluate the City stormwater fee program for potential revisions. In addition, require new development to complete stormwater plans covering drainage, flood control, and storm water quality/permitting. Use the master plan and project-level stormwater plans to assess future development, and require that future development construct the required on and off-site infrastructure. Implementation of this mitigation measure should be timed to anticipate and precede significant developments that would be most likely to place large demands on the current stormwater system.	**Measure 3.9.1:** Implement Best Management Practices from Stormwater Pollution Prevention Plan. The applicant shall renew its existing Stormwater Pollution Prevention Plan (SWPPP) for construction and operation of the proposed project for compliance with required NPDES construction permitting, and to reduce the intensity of potential water quality impacts associated with operation of the proposed project. The SWPPP shall identify all pollutant sources that may affect the quality of stormwater discharge, and shall require the implementation of Best Management Practices (BMPs) to reduce pollutants in storm water discharges during construction and operation. BMPs may include, but would not be limited to: x Excavation and grading activities shall be scheduled for the dry season only (to October 14), to the extent possible. This will reduce the chance of severe erosion from intense rainfall and surface runoff. x If excavation occurs during the rainy season, storm runoff from the construction area shall	No potentially significant or significant impacts were identified in this issue area.	HYDRO-1: During construction and grading, erosion and sediment control measures will be conducted in accordance with City of Stockton's stormwater management requirements and best management practices for the reduction of pollutants in runoff (City of Stockton, City of Stockton General Plan Background Report. Adopted January 22, 1990; City of Stockton, Stormwater Division, Model Storm Water Pollution Prevention Plan for Construction Activities. May 15, 1997). The proposed project would be subject to NPDES requirements and would require the acquisition of a NPDES general construction permit (State Water Resources Control Board [SWRCB], NPDES, General Construction Permit Requirements). The owner, developer, and/or successors-in-interest (ODS) is required to file a notice of intent (NOI) with the State Water Resources Control Board (SWRCB) prior to commencement of construction activity. Upon receipt of the completed NOI the ODS will be sent a receipt letter containing the Waste Discharger's Identification Number	. Existing IS/MND mitigation measures are consistent with existing City storm water quality management requirements.

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		be regulated through a storm water management/erosion control plan that shall include temporary onsite silt traps and/or basins with multiple discharge points to natural drainages and energy dissipaters. Stockpiles of loose material shall be covered and runoff diverted away from exposed soil material. If work stops due to rain, a positive grading away from slopes shall be provided to carry the surface runoff to areas where flow would be controlled, such as the temporary silt basins. Sediment basins/traps shall be located and operated to minimize the amount of off-site sediment transport. Any trapped sediment shall be removed from the basin or trap and placed at a suitable location on-site, away from concentrated flows, or removed to an approved disposal site. x Temporary erosion control measures (such as fiber rolls, staked straw bales, detention basins, check dams, geofabric, sandbag dikes, and similar measures) shall be provided until construction is complete or landscaping is established and can minimize discharge of sediment into nearby waterways. All storm drains shall be protected from sedimentation using such measures. x Sediment shall be retained on-site by a system of sediment basins, traps, or other appropriate measures. x No disturbed surfaces will be left without erosion control measures in place during the rainy season, from October 15th through April 30th. x Erosion protection shall be provided on all cut-and-fill slopes. Landscaping shall be initiated as soon as possible after completion of grading and prior to the onset of the rainy season (by October 15). Construction-related stormwater BMPs selected and implemented for the project shall be in place and operational prior to the onset of major earthwork on the site. The construction phase facilities shall be maintained regularly and cleared of accumulated sediment as necessary. Operation related stormwater BMPs shall be incorporated into project design and fully implemented prior to completion of construction and associated activities for the project. Effective mechanical and structural BMPs that could be implemented at the project site include the following: x Mechanical storm water filtration measures, including oil and sediment separators or absorbent filter systems such as the Stormceptor® system, can be installed within the storm drainage system to provide filtration of storm water prior to discharge. x Vegetative strips, high infiltration substrates, and grassy swales can be used where feasible throughout the development to reduce runoff and provide initial storm water treatment. x Drains shall discharge to natural surfaces, swales, or other stormwater retention features to avoid excessive peak stormwater flows. The water quality detention basins during construction shall be designed to provide effective water quality control measures including the following: x Maximize detention time for settling of fine particles; x Establish maintenance schedules for periodic removal of sedimentation, excessive vegetation,		(WDID) from the SWRCB to be submitted prior to issuance of a Grading Permit or plan approval. A stormwater pollution prevention plan (SWPPP) shall be prepared for the project. The SWPPP shall include Best Management Practices (BMPs) to control sediment discharge and pollutant run-off from construction activities and shall also include an erosion control plan. The SWPPP is required to be available onsite. The proposed project must also comply with the Stormwater Quality Control Criteria Plan, as outlined in the City's Phase 1 Stormwater NPDES permit issued by the California Water Quality Control Board, Central Valley Region (Order No. R5-2002-0181). In addition, the City's Stormwater Quality Control Criteria Plan requires that the ODS of a commercial project execute a Maintenance Agreement with the City prior to receiving a Certificate of Occupancy. The ODS must remain the responsible party and provide funding for the operation, maintenance, and replacement costs of the proposed treatment devices built for the subject project. HYDRO-2: The Applicant shall prepare a Master Drainage Plan for the project site. The Drainage Plan should incorporate measures to minimize the increased runoff during peak conditions and shall calculate and demonstrate the required volume of the off-site detention basin. The applicant will implement measures provided in the Drainage Plan. A detailed drainage report shall be prepared by a registered civil engineer prior to site development. The report shall include the following items: • An assessment of existing drainage facilities within the project vicinity, and an inventory of necessary upgrades, replacements, redesigns, and/or rehabilitation. • A description of the proposed maintenance program for the project drainage system. • Standards for drainage systems to be installed on a project-specific basis. • The drainage system shall be designed to meet standards in the Stockton Municipal Code and the City of Stockton Department of Public Works Standard Specifications (current edition). The Drainage Plan shall include, and the Applicant shall implement, a schedule for identified drainage improvements. In addition, when approving specific developments that may result in increased drainage flows on the project site, the Applicant shall concurrently implement any necessary drainage improvements such that new development does not exceed the capacity of drainage facilities. The proposed project will also be required to provide post construction Best Management Practices (BMP's) as part of the projects design per City of Stockton Code 7-859 to prevent and contain surface water runoff.	

Impact/Category*	Adopted Mitigation Measures from the 2040 General Plan EIR	Adopted Mitigation Measures from the NorCal Logistics Center Project EIR (P12-110)	Adopted Mitigation Measures from the Sanchez-Hoggan Annexation Project EIR (P19-0691)	Adopted Mitigation Measures from the Archtown First Industrial Project MND	City Ordinances, Programs and Standards Applicable to Archtown
		and debris that may clog basin inlets and outlets; x Maximize the detention basin elevation to allow the highest amount of infiltration and settling prior to discharge. x Hazardous materials such as fuels and solvents used on the construction sites shall be stored in covered containers and protected from rainfall, runoff, vandalism, and accidental release to the environment. All stored fuels and solvents will be contained in an area of impervious surface with containment capacity equal to the volume of materials stored. A stockpile of spill cleanup materials shall be readily available at all construction sites. Employees shall be trained in spill prevention and cleanup, and individuals shall be designated as responsible for prevention and cleanup activities. x Equipment shall be properly maintained in designated areas with runoff and erosion control measures to minimize accidental release of pollutants			
Land Use / Planning	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area. Land use related needs are required of new development as a matter of policy.	Measure 3.10.2: Incorporate Building Design Features Consistent with SJCALUP Guidance. Any proposed structure over 200' above ground level; or construction which includes reflective material (other than traffic markings), unusual levels of lighting, or telecommunications equipment, shall be submitted to the FAA (San Francisco Airports District Office) for review (using Form 7460-1) to determine if the proposed construction would be a hazard to navigable airspace. For new development within the Airport Influence Area, ALUC review is required for any proposed object taller than 100 feet AGL.	The Sanchez-Hoggan EIR did not identify potentially significant or significant impacts or mitigation measures in this issue area.	LU-1a: Provide stormwater management facilities in accordance with FAA criteria for preventing the creation of wildlife attractants near airports. To prevent the creation of potential wildlife attractants, design stormwater detention basin using the following criteria set forth by FAA in accordance Advisory Circular 5200-33B, "Wildlife attractants on or near Airports:" • Prevent the creation of open-water sources to the greatest extent possible. Design, engineered, constructed, and maintained any detention ponds to drain within 24-48 hours following the 100-year storm event and to remain completely dry between storms. • Provide narrow, linear ponds with steep-slopes (1:1 ratio). • Ensure that all vegetation and landscaping materials do not provide a food, cover or habitat for potentially hazardous wildlife. • Consult with Stockton Metropolitan Airport and Caltrans Aeronautics Division to review stormwater management plans prior to final design. LU-1b: Buildings and structures are not to exceed 150 feet in height.	Existing mitigation would remain. As is typical, complete drainage analysis would be required by the City prior to issuance of building permit.
Mineral Resources	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Norcal EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Sanchez-Hoggan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Archtown IS/MND did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	There do not appear to be any mineral resources within the project area as defined by the General Plan EIR.
Noise	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area. Noisse issues related to new development are resolved as a matter of consistency with applicable noise policies and standards.	Measure 3.11.1: Construction-Related Noise Measures. The City shall ensure that the project applicant or construction contractor will implement the following construction-related noise reducing measures: x Construction activities shall be limited to between 7:00 a.m. and 7:00 p.m. Monday through Saturday to avoid noise-sensitive hours of the day. Construction activities shall be prohibited on Sundays and holidays. x Construction equipment noise shall be minimized during project construction by muffling and shielding intakes and exhaust on construction equipment (per the manufacturer's specifications) and by shrouding or shielding impact tools. x Construction contractors shall locate fixed construction equipment (such as compressors and generators) and construction staging areas as far as possible from nearby residences. x Signs will be posted at the construction site that include permitted construction days and hours, a day and evening contact number for the job site, and a contact number with the City of	NOISE-1: Construction activities shall adhere to the requirements of the City of Stockton Municipal Code with respect to hours of operation. The City shall limit construction activities on the Hoggan property to the hours of 7:00 a.m. to 10:00 p.m., Monday through Saturday, except for concrete pouring related to building construction. No construction shall occur on Sundays or national holidays without a written permit from the city. All equipment shall be in good working order and shall be fitted with factory-equipped mufflers. Should the project necessitate construction outside of the specified hours, the applicant shall request the Community Development Director's approval of such activities. The applicant shall accompany the request with evidence that the proposed activity will not create a noise disturbance across a residential property line.	Noise-1: The applicant shall implement the following measures: • Construction activities shall be limited to between 7:00 a.m. and 7:00 p.m. Monday through Saturday to avoid noise-sensitive hours of the day. Construction activities shall be prohibited on Sundays and holidays. • Construction equipment noise shall be minimized during project construction by muffling and shielding intakes and exhaust on construction equipment (per the manufacturer's specifications) and by shrouding or shielding impact tools. Construction contractors shall locate fixed construction equipment (such as compressors and generators) and construction staging areas as far as possible from nearby residences. Noise-2: To further address the nuisance impact of project construction, construction contractors shall implement the following: • Signs will be posted at the construction site that include permitted construction days and hours, a day and evening contact number for the job site, and a contact number with the City of Stockton in the event of problems. • An onsite complaint and enforcement manager shall track and respond to noise complaints.	Existing measures would apply, along with General Plan and municipal code standards.

Exhibit 1- Comparable Mitigation Measures Summary

Impact/Category*	Adopted Mitigation Measures from the 2040 General Plan EIR	Adopted Mitigation Measures from the NorCal Logistics Center Project EIR (P12-110)	Adopted Mitigation Measures from the Sanchez-Hoggan Annexation Project EIR (P19-0691)	Adopted Mitigation Measures from the Archtown First Industrial Project MND	City Ordinances, Programs and Standards Applicable to Archtown
		Stockton in the event of problems. x An onsite complaint and enforcement manager shall track and respond to noise complaints. Measure 3.11.2a: Measures to Reduce HVAC Equipment Noise. The project applicant shall ensure that HVAC units on northwest buildings of Lot 7 (north map) shall be located away from nearby residences, on building rooftops, and properly shielded by either the rooftop parapet or within an enclosure that effectively blocks the line of site of the source from the nearest receivers Measure 3.11.2b: Measures to Reduce Loading Dock Noise. The project applicant shall ensure that loading docks in northwest buildings of Lot 7 (north map) shall be located away from nearby residences (i.e., on south or east sides of buildings) or shall be shielded with appropriate wing walls that effectively block the line of site of the loading docks from the nearest receivers Measure 3.11.2c: Measures to Reduce Traffic Noise. The applicant shall notify the homeowners along roadway segment 1 of the noise impacts associated with the traffic from project operations. With the homeowners' approval, the applicant shall construct 6-foot solid fences along the property line of affected residences. Alternatively, residential building facades can be upgraded to reduce interior noise levels (e.g., improved windows and doors). While these measures could substantially reduce the impact of increased traffic noise on the interior environment of existing noise-sensitive uses, no enforcement mechanism has been identified to ensure implementation of the measures nor has any related funding mechanism been identified.		Noise-3: HVAC units shall be located away from nearby residences, on building rooftops, and properly shielded by either the rooftop parapet or within an enclosure that effectively blocks the line of site of the source from the nearest receivers and shall comply with City of Stockton and San Joaquin County noise ordinance standards for stationary sources. Noise-4: The applicant shall require project buildings on Lots that are adjacent to a residential land use to be oriented such that the loading docks would be on the side of the building furthest from the residence. Buildings on Lot A would have loading docks located on the south side. Buildings on Lot C, E, and H would have loading docks located on the south side, and buildings on Lot G would have loading docks located on the south or east side of the respective building structures. Project Architect/Engineer Building Department Plan check Noise-5: The applicant shall construct a 6-foot noise wall along the project Lot G western edge, to block the line-of-site between the adjacent residence and Newcastle Road traffic and Lot G facility operations.	
Population / Housing	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Norcal EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Sanchez-Hoggan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Archtown IS/MND did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	Housing is not allowed in the proposed prezone area.
Public Services	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Norcal EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	PSR-1: The developer shall incorporate Early Suppression Fast Response fire sprinkler systems in the project building design and construction. The Stockton Fire Department shall review and approve such systems prior to their installation	The Archtown IS/MND did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The applicant has entered into a three party agreement for additional fire services.
Recreation	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Norcal EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Sanchez-Hoggan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Archtown IS/MND did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	Recreation is not an existing or proposed use in the project area. Recreation is not allowed in the proposed prezone area.
Transportation/Traffic	TRAF-1a: The City shall implement the following to reduce the severity of potential LOS impacts on the following City roadway segments: March Lane at UPRR. The adopted 2035 General Plan identifies an eight-lane cross section for this roadway from North El Dorado Street to State Route 99. The proposed General Plan envisions a six-lane cross-section through 2040. With an eight-lane cross-section, the roadway would operate within the established LOS policy. Therefore, to mitigate the impact, the City shall reserve sufficient right-ofway to accommodate an eight-lane cross-section, plus associated turn pockets at intersections. Construction of an eight-lane cross-section would result in an acceptable level of service for vehicles, but could preclude the provision offacilities that would encourage higher levels of transit ridership, walking and bicycling along the corridor. Prior to the construction of additional roadway improvements along the March Lane corridor, the City shall conduct a focused complete streets study to analyze and evaluate peak hour and daily operations of March Lane between I-5 and State Route 99 to identify the cross-section	Measure 3.13.1: Restripe Arch Road to Provide Second Westbound Lane. The applicant shall restripe Arch Road to provide a second westbound through lane on Arch Road from approximately 500 feet east of Newcastle Road to Fite Court. Measure 3.13.2: Project's Fair Share Contribution to SR99 Widening. The applicant shall pay the Public Facilities Fees (PFF), which includes the Regional Transportation Impact, Street Improvements, and Traffic Signal Fees. Payment of these fees would constitute the Project's fair share contribution to on-going widening of SR 99 from SR 120 to the Crosstown Freeway to provide three travel lanes in each direction. This improvement is fully funded, including funding from Measure K as well as Regional Transportation Impact Fees. Construction is expected to be completed in 2015/2016. Measure 3.13.3a: Project's Fair Share Contribution to Arch-Airport Road/Sperry Road Specific	TRANS-1: The project applicant shall contribute fair-share costs to the installation of a traffic signal at the intersection of Arch Road and Frontier Way and related improvements. If needed to meet short-term traffic needs, the City may require applicant to design and construct the signal, subject to reimbursement. The project applicant shall submit a traffic analysis for the City's approval to determine if the intersection improvements can be aligned with development related impacts should the proposed site be constructed in phases.	TRAF-1: The project applicant shall contribute its fair share to the construction of a free northbound right-turn lane at the intersection of Arch-Airport Road and SR 99 Ramps. With construction of this improvement, additional capacity would be provided, resulting in acceptable operations during the AM and PM peak hours, reducing the project's impact to a less-than-significant level. Project Applicant Planning Department Prior to operation TRAF-2: The project applicant shall contribute its fair share to the construction improvements that would result in acceptable operations at the intersection of Arch Road and Newcastle Road, including construction of a third westbound through lane and modifications to the southbound approach to provide a left-turn lane, through lane, and a right-turn only lane. The westbound left-turn lane and northbound left-turn lane should be designed to provide 300 feet of vehicle storage. The traffic signal would need to be modified to provide protected north/south phasing. Additionally, the project applicant shall install fiber	The existing adopted mitigation measures still apply. Changes to design may require modified traffic analysis, to be determined when site and building improvement plans are submitted.

Impact/Category*	Adopted Mitigation Measures from the 2040 General Plan EIR	Adopted Mitigation Measures from the NorCal Logistics Center Project EIR (P12-110)	Adopted Mitigation Measures from the Sanchez-Hoggan Annexation Project EIR (P19-0691)	Adopted Mitigation Measures from the Archtown First Industrial Project MND	City Ordinances, Programs and Standards Applicable to Archtown
	required to accommodate existing and planned growth. The complete streets study shall consider the potential mode shift under scenarios that provide additional bicycle, pedestrian, and transit facilities along the corridor. Should the complete streets study show that corridor operations would fall within the established level of service standard for the six-lane cross-section, an implementation program of the identified bicycle, pedestrian, and transit improvements shall be required. Alternatively, the mitigation measure is to provide an eight-lane cross-section for vehicles. Implementation of this mitigation measure would reduce the potential impact to a less-than-significant level. ▯ March Lane between West Lane and Bianchi Road. The adopted 2035 General Plan identifies an eight-lane cross section for this roadway from North El Dorado Street to State Route 99. The proposed General Plan envisions a sixlane cross-section through 2040. With an eight-lane crosssection, the roadway would operate within the established LOS policy. Therefore, to mitigate the impact, the City shall reserve sufficient right-of-way to accommodate an eightlane cross-section, plus associated turn pockets at intersections. Prior to the construction of additional roadway improvements along the March Lane corridor, the City shall conduct a focused complete streets study to evaluate peak hour and daily operations of March Lane between I-5 and State Route 99 to identify the cross-section required to accommodate existing and planned growth. The analysisshall consider the potential mode shift under scenarios that provide additional bicycle, pedestrian, and transit facilities along the corridor. Should corridor operations fall within the established level of service standard with a six-lane crosssection, the study shall identify bicycle, pedestrian, and transit enhancements that are necessary to serve the corridor. Otherwise, the mitigation measure is to provide an eight-lane cross-section for vehicles. Implementation of this mitigation measure would reduce the potential impact to a less-than-significant level. ▯ Dr. Martin Luther King Jr. Boulevard between I-5 and Airport Way. This section of Dr. Martin Luther King Jr. Boulevard is built out to its ultimate capacity and no further improvements are planned. Provision of parallel capacity in the area would provide alternative travel choices within this area of South Stockton, but is not expected to result in LOS D operations in the Cumulative with Proposed Plan condition. Therefore, this impact would remain significant and unavoidable. ▯ 8th Street between Pock Lane and D Street. This roadway section currently provides one travel lane in each direction with on-street parking within a 60-foot curb-to-curb right-ofway. There is sufficient right-of-way to modify the roadway cross-section to maintain on-street parking (8 feet), provide bicycle lanes (6 feet), one travel lane in each direction (10 feet), and a center two-way left-turn lane (12-feet). With modifications within the existing right-of-way, vehicular capacity could increase, reducing the impact to a less-thansignificant level. Therefore, to mitigate the impact, the City shall conduct a detailed engineering study of 8th Street between El Dorado Street and Mariposa Road to identify roadway improvements that can be implemented within the existing right-of-way to improve travel for all modes, especially considering the potential for a grade-separated crossing of the railroad tracks, which would provide anadditional east-west connection in South Stockton. Implementation of this mitigation measure would reduce this impact to a less-than-significant level. ▯ Arch Airport Road between SR 99 and Quantas Lane. This	Road Plan Road Improvements. The applicant shall pay the PFF which would constitute their fair share to the construction of planned improvements identified in the Arch-Airport Road/Sperry Road Specific Road Plan (August 2003), which includes the widening of Arch Road to provide two travel lanes in each direction as shown on Figure 3.13-6 Measure 3.13.3b: Construct Westbound Right-Turn Only Lane at Arch Road/Newcastle Road Intersection. The applicant shall construct 770 feet (500 feet plus 270 feet of taper) of a right-turn only lane for the westbound approach of the Arch Road/Newcastle Road Intersection. Measure 3.13.9a: Provide Adequate Vehicle Storage. At Arch Road/Newcastle Road, the eastbound left-turn lane should be designed to provide approximately 350 feet of vehicle storage. At Arch Road/Logistics Drive, the eastbound left-turn lane should be designed to provide 300 feet of vehicle storage, and the southbound right-turn lane should be designed to provide 300 feet of vehicle storage. At Mariposa Road/Newcastle Road, the eastbound right-turn should be designed to provide 150 feet of vehicle storage and the northbound left-turn should be designed to provide 300 feet of storage. Measure 3.13.9b: Provide Adequate Driveway Access on Newcastle Road. The first driveway on Newcastle Road, serving Southern Lot 1 should be at least 300 feet from the Arch Road/Newcastle Road intersection, or restricted to right-in/right-out operation. Measure 3.13.9c: Provide Adequate Emergency Vehicle Access. For each developable lot, the applicant shall consult with the City of Stockton fire department to ensure that the site plan provides adequate emergency vehicle access.		optic cabling interconnect from where the project starts in the west to the intersection of Fite Court and Arch Road on the south side of Arch Road. With implementation of this improvement, the intersection would operate at an acceptable level of service during the PM peak hour, therefore reducing the project's impact to a less-than-significant level. Project Applicant Planning Department Prior to operation TRAF-3a: The project applicant shall provide access to Frontier Way. When Frontier Way is extended to the south of Arch Road and that property developed, the internal roadway should connect to Frontier Way to allow vehicles from the site traveling west towards SR 99 an alternative exit. The Frontier Way/Arch Road intersection has sufficient excess capacity to accommodate the added traffic from the project site while maintaining acceptable operations. With the Frontier Way connection, operation of the side-street would improve from LOS F to LOS D and signal warrants would not be satisfied during the peak hour. Or: TRAF-3b: The project applicant shall signalize the driveway. Signalization of the driveway would result in acceptable levels of service at this driveway. Depending on the driveway's ultimate proximity to the Arch Road/Newcastle Road intersection, the intersection spacing may not be sufficient to provide a signalized access at this location. Signalization would result in LOS B during the PM peak hour. Implementation of either Mitigation Measure 3a or Mitigation Measure 3b would result in acceptable service levels at this intersection, reducing the impact to a less-than-significant level.	

Impact/Category*	Adopted Mitigation Measures from the 2040 General Plan EIR	Adopted Mitigation Measures from the NorCal Logistics Center Project EIR (P12-110)	Adopted Mitigation Measures from the Sanchez-Hoggan Annexation Project EIR (P19-0691)	Adopted Mitigation Measures from the Archtown First Industrial Project MND	City Ordinances, Programs and Standards Applicable to Archtown
	section of Arch-Airport Road is built out to its ultimate capacity and no further improvements are planned. Provision of parallel capacity in the area would provide alternative travel choices within this area of South Stockton, but is not expected to result in LOS D operations in the Cumulative with Proposed Plan condition. Therefore, this impact would remain significant and unavoidable. ▯ California Street between Harding Way and Park Street. Prior to the construction of roadway improvements along the California Street corridor, the City shall conduct a focused complete streets study to evaluate peak hour and daily operations of California Street from north of Harding Way to south of Park Street. The evaluation shall consider the effect of providing exclusive bicycle facilities on peak hour and daily operations along the corridor. The study shall also evaluate parallel roadway facilities that could potentially see an increase in vehicle traffic with a lane reduction on California Street. Should the study indicate vehicle operations would fall below the level of service standard for the facility, even considering potential traffic shifts to other roadways (and the secondary impact of those shifts), and the potential mode shift to non-auto travel modes, the mitigation measure is to retain the existing vehicle capacity and explore other alternatives for providing bicycle facilities through the corridor. Should the analysis indicate vehicle levels of service would remain within the City's standard for the roadway facility, the mitigation measure is to construct exclusive bicycle facilities within the existing cross-section. Implementation of this mitigation measure would reduce this impact to a less-than-significant level. B Street between Dr. Martin Luther King Jr. Boulevard and 4th Street. The City shall reserve sufficient right-of-way to accommodate a four-lane cross-section, plus associated turn pockets at intersections. Prior to the construction of additional roadway improvements along the B Street corridor, the City shall conduct a focused complete streets study to evaluate peak hour and daily operations of B Street between Dr. Martin Luther King Jr. Boulevard and Arch-Airport Road to identify the cross-section required to accommodate existing and planned growth. The analysis shall consider the potential mode shift under scenarios that provide additional bicycle, pedestrian, and transit facilities along the corridor. Should corridor operations fall within the established level of service standard with a two-lane cross-section, the study shall identify bicycle, pedestrian, and transit enhancements that are necessary to serve the corridor. Otherwise, the mitigation measure is to provide a four-lane cross-section for vehicles. Implementation of this mitigation measure would reduce the potential impact to a less-than-significant level. **TRAF-1b:** The City shall implement the following to reduce the severity of potential LOS impacts on the following freeway segment: ▯ State Route 99 between Farmington Road and Fremont Street. The Cumulative with Proposed Plan transportation analysis considers the widening of State Route 99 through Stockton to its ultimate planned width. No additional improvements have been identified. Implementation of the proposed General Plan and its associated policies are expected to provide alternative travel choices to Stockton residents and workers, shifting travel patterns and modes. However, deficient operations are expected to occur on State Route 99, and this impact would remain significant and unavoidable. **TRAF-2:** The City of Stockton shall continue to participate in planning efforts for regional transportation facilities.				

Exhibit 1- Comparable Mitigation Measures Summary

Impact/Category*	Adopted Mitigation Measures from the 2040 General Plan EIR	Adopted Mitigation Measures from the NorCal Logistics Center Project EIR (P12-110)	Adopted Mitigation Measures from the Sanchez-Hoggan Annexation Project EIR (P19-0691)	Adopted Mitigation Measures from the Archtown First Industrial Project MND	City Ordinances, Programs and Standards Applicable to Archtown
Tribal Cultural Resources	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Norcal EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Sanchez-Hoggan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Archtown IS/MND did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	None adopted
Utilities / Service Systems	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Norcal EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Sanchez-Hoggan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Archtown IS/MND did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	Design and installation required by the City prior to operation of any proposed onsite use.
Mandatory Findings of Significance	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Norcal EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Sanchez-Hoggan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Archtown IS/MND did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	None adopted
Other	The General Plan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Norcal EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Sanchez-Hoggan EIR did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	The Archtown IS/MND did not identify any significant or potentially significant impacts or require mitigation measures in this issue area.	None adopted

*Impact Categories based on 2020 CEQA Appendix G: Environmental Checklist Form

EXHIBIT 2
NEW APPENDIX F TO ADOPTED ARCHTOWN IS/MND
AIR QUALITY IMPROVEMENT MEASURES

The following measures are added to the Archtown First Industrial Mitigated Negative Declaration (MND) as a new Appendix F. These measures exceed the existing mitigation measures and will be implemented by the City of Stockton prior to the applicable construction phase.

Prior to Operation of Tenant/On-Going

1. **(Prior to Operation/Ongoing)** For future tenants with more than 100 Employees per shift, tenant improvement plans shall be submitted for review and approval by Community Development Department to verify the incorporation of changing/shower facilities for building occupants to encourage and facilitate bicycle commuting, pursuant to Section A5.106.4.3 of the California Green Building Code Standards, voluntary measures. If applicable, these changing/shower facilities shall be installed and functional, prior to final tenant occupancy. The Applicant will include a reference to the recommendation in the project CC&Rs for future tenants to review, prior to tenant improvement approval by the City of Stockton.
2. (**Prior to Operation/Ongoing**) All heavy-duty trucks used for dirt and material hauling during construction shall meet current CARB regulations and Include such specifications in construction documents and implement them throughout construction.
3. (**Prior to Operation/Ongoing**) Construction contracts shall require compliance with all applicable air quality regulations. Include these specifications in construction documents.
4. (**Prior to Operation/Ongoing**) All site operations shall comply with applicable air quality regulations. Include these restrictions through tenant leases or in recorded covenants.
5. (**Prior to Operation/Ongoing**) During construction, electric-powered, battery-powered, natural gas, or hybrid off-road construction equipment will be utilized where available to assist in on-going onsite operations. If substantial evidence is provided by the permittee or its contractor that such equipment is not commercially available, including a description of commercially reasonable efforts to secure such equipment, off-road diesel-powered construction equipment greater than 50 horsepower will meet USEPA Tier 4 off-road emission standards. Further, all permanent onsite generators shall be alternative- powered and/or electric or battery-powered, natural gas-powered or hybrid. The permittee shall ensure that this condition is incorporated into its general construction contract and that the general contractor will incorporate this condition in all relevant sub-contracts. Provide specifications in construction plans and, in the contract, or contract specifications.
6. (**Prior to Operation/Ongoing**) All off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction shall be electric-powered, provided that it is commercially available, which may be plug-in or battery.
7. (**Prior to Operation/Ongoing**) The Applicant/Owner shall include written information regarding CARB's proposed ACT Rule and the Clean Truck Programs as exhibits to the project CC&Rs or all tenant leases.
8. (**Prior to Operation/Ongoing**) To further promote alternative fuels and help support clean truck fleets, tenants shall be provided with written information that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. Tenants will also be provided with written information about the availability of (1) alternatively fueled cargo handling equipment; (2) grant programs for diesel-fueled vehicle engine retrofit and/or replacement; (3) designated truck parking locations in the project vicinity; (4) access to alternative fueling stations proximate to the site that supply alternative fuels, including but not limited to, compressed natural gas, hydrogen, and electricity; and (5) the US Environmental Protection Agency's SmartWay program. The Applicant/Owner shall ensure that its Tenant leases include a signed acknowledgment by the lessee that it has received and

reviewed the written information provided pursuant to this condition. Provide the specified data to tenants. The Applicant shall include these measures in the CC&Rs as recommendations or guidelines.

9. (**Prior to Operation/Ongoing**) All construction equipment, trucks, and vehicles during construction and project operations shall be limited to idling onsite for no longer than five minutes. This shall be reinforced by signage on the property and included in the CC&Rs.
10. (**Ongoing**) The Applicant, developer and/or successors-in-interest (ADS) for the project shall retain a qualified professional to prepare a detailed plan for implementation of the Air Quality Improvement Measures described in Appendix F of the certified MND for the Archtown First Industrial Annexation Project. The Plan shall consider the range of anticipated tenants and feasible means for implementation of the measures based on substantial evidence. Substantial evidence may include records of commercially reasonable efforts to obtain the required equipment or evidence that the use of such equipment is not commercially available or financially feasible and shall describe the ADS' alternative efforts to achieve the objective of the measure.

    Upon request by the City, the ODS shall submit the Plan to the Stockton Community Development Department (hereafter "City") every three years from the effective date of the City approval. The Plan shall consider the existing tenants, substantial evidence for adherence to air quality improvement measures included in the Appendix F of the certified MND, and identification and reasoning for any measure not fully adhered to due to hardship or financial infeasibility. The City is responsible for acceptance and enforcement of the monitoring Plan; however, a copy of the Plan will be made available by the City if requested by the responsible and trustee agencies involved in the original environmental analysis approved with the Project MND.
11. (**Prior to Operation/Ongoing**) Tenants within the project site shall be subject to the following requirements:
    a. Tenants with 100 or more employees shall prepare a Trip Reduction Plan providing information on transit and ridesharing in compliance with SJVAPCD Rule 9410.
    b. Tenants with 100 or more employees shall provide onsite meal options such as break rooms, food trucks.
    c. All tenant-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025.
    d. Tenants shall utilize electric-powered or zero-emission forklifts, tuggers, and other off-road mobile equipment to the degree feasible. The developer will provide infrastructure for the tenant to install charging stations for yard equipment.
    e. Tenants shall use zero-emission light - and medium-duty vehicles to the degree feasible.
    f. The developer will provide signage at entrances indicating that truck operators shall turn off engines when not in use and observe State idling requirements.
    g. Provide electric truck charging stations at dock doors proportional to demand.
    h. Provide electric TRU electrical connections at dock doors proportional to demand.
    i. Provide electric light vehicle charging stations per code requirements and proportional to demand.
    j. The proposed building will be solar-adaptable per code requirements.
    k. Standby generators fuel systems shall be non-diesel where feasible.

l. The CC&R's shall recommend tenants to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
m. Comply with applicable Stockton Building Codes, greenhouse gas reduction requirements, and energy conservation standards.
n. Provide exit signage, directing trucks to truck routes.
o. The CC&R's shall recommend staff training in pollution control requirements and related record-keeping.
p. The CC&R's shall include information related to the availability of incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade truck fleets.
q. The CC&R's shall make specific reference to air quality improvement measures promoting the use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration technologies, such as the above measures "g," "h" and "i.".
r. The CC&R's shall advise tenants of various applicable State emission control requirements.

Should effectuation of these measures create a hardship due to lack of adequate equipment or if financially infeasible due to market constraints, the permittee or its contractor shall provide substantial evidence that such equipment is not commercially available or the improvement are not financially feasible and include an alternative effort to achieve the desired result of the measure.

12. (**Prior to Operation/Ongoing**) The Applicant shall provide tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade truck fleets.

Design/Pre-Construction

13. (**Site Plan Review**) The Applicant will provide conduits to primary dock locations for future EV truck charging and/or other electric back up support. Proposed buildings will be solar-adaptable as per the above measure "1-j.".
14. **(Site Plan Review**) The Applicant will install EV-ready conduits and charging station locations as required in the City of Stockton Building Code.
15. **(Site Plan Review**) Signage on both sites shall meet the following standards:
    a. Entry and exit points are clearly designated.
    b. Truck parking and maintenance activity is confined to the project site and is not allowed on nearby public streets.
16. **(Site Plan and Design Review**) To assist in countywide efforts to divert recyclable wastes from landfill disposal that can produce greenhouse gases when the wastes decompose, throughout the operating life of the project, the property owner shall provide both recycling bins and trash bins in all trash enclosures, as available by the local waste hauling company, to assist with the separation of recyclables and trash.
17. **(Design Review**) The project shall be designed, constructed in accordance with LEED green building certification standards. Include such specifications in construction documents. Construct accordingly.

Grading/Construction

18. **(Note on Plans and Ongoing)** The construction contractor shall:

a. Water a minimum of three times daily to control dust during any activities that generate dust,
b. Apply chemical soil stabilizers on inactive areas (i.e., disturbed areas within the site that are unused for four consecutive days) during grading operations,
c. Suspend any dust-generating operations when wind speeds exceed 25 miles per hour,
d. At least once a day during ground-disturbing activities operate PM10-efficient street sweepers or roadway- washing trucks on adjacent roadways to remove dirt dropped by construction vehicles or dried mud carried off by trucks moving or bringing materials, and Schedule construction activities in accordance with specific San Joaquin County Air Quality Management District (AQMD) directives.

19. (**Prior to the issuance of grading or building permits and On-Going**) The permittee/applicant shall provide verification that construction specifications establish a five-minute idling limit for all heavy-duty construction equipment utilized during construction of the proposed project. Signage shall be posted throughout the construction site regarding the idling time limit, and the construction contractor shall maintain a log for review by City inspectors. The log shall verify that construction equipment operators are advised of the idling time limit at the start of each construction day. Note idling limits in construction specifications. Maintenance of logs required.
20. (**Prior to the issuance of the building permit)** The permittee/applicant shall provide a cool roof specifications in construction plans verifying specifications for the proposed warehouse roof would utilize cool roofing materials with an aged reflectance and thermal emittance values that are equal to or greater than those specified in the 2016 CALGreen Building Standards Table A5.106.11.2.2 for Tier 1 and the City's Green Building Standards within Chapter 15.72 of the Stockton Municipal Code.
21. **(Prior to the issuance of the building permit)** Proposed building plans will include electrical system features that will encourage use of electrically powered landscaping equipment, such as lawnmowers and leaf blowers.
22. (**Prior to issuance of a Certificate of Occupancy**) The permittee/applicant shall provide verification that tenant leases or covenants recorded with any future ownership changes shall require all off-road equipment (non-street legal), such as forklifts and street sweepers, that are used onsite during project operations to be powered by alternative fuels, electrical batteries or other non-diesel fuels (e.g., propane) that do not result in diesel particulate emissions and result in low or zero emissions. Include these restrictions through tenant leases or in recorded covenants.
23. (**Prior to issuance of a Certificate of Occupancy**) Building contractors for the project shall be subject to the following requirements:
    a. Haul trucks and large onsite diesel equipment shall be equipped with CARB Tier IV-compliant engines or better, if available.
    b. Small equipment shall be electric or low-emission, where feasible.
    c. Off-road diesel-powered equipment shall not be left in the "on position" for more than 10 hours per day.
    d. Provide temporary electrical hookup to the construction yard and associated work areas.
    e. Prepare and implement a Dust Control Plan approved by the APCD with robust watering requirements.
    f. Prohibit the idling of heavy equipment for more than 5 minutes.
    g. Maintain on the construction site an inventory of construction equipment, maintenance records, and datasheets, including design specifications and emission control tier classifications.

h. Participate in City mitigation monitoring efforts as required.
i. Comply with SJVAPCD Rule 4601, limiting VOCs in architectural coatings.

EXHIBIT 3
MODIFIED ARCHTOWN MMRP

MITIGATION MONITORING AND REPORTING PROGRAM (continued)

TABLE C-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/Reporting Responsibility	Timing
Air Quality	**AIR-1:** The applicant shall comply with Regulation VIII Rule 8011 and implement the following control measures during construction: • The applicant shall submit a Dust Control Plan subject to review and approval of the SJVAPCD at least 30 days prior to the start of any construction activity on a site that includes 40 acres or more of disturbed surface area. Specific control measures for construction, excavation, extraction, and other earthmoving activities required by the Valley Air District include: • All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover in order to comply with Regulation VIII's 20 percent opacity limitation. • All onsite unpaved roads and offsite unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant. • All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking. • When materials are transported offsite, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained. • All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. However, the use of blower devices is expressly forbidden, and the use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. • Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant. • Within urban areas, trackout shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday.	Contractor	Construction Inspector	During construction

TABLE C-1
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/Reporting Responsibility	Timing
	• Any site with 150 or more vehicle trips per day shall prevent carryout and trackout. Enhanced and additional control measures for construction emissions of PM10 shall be implemented where feasible. These measures include: Limit traffic speeds on unpaved roads to 15 mph. • Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent. • Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site. • Install wind breaks at windward side(s) of construction areas. • Suspend excavation and grading activity when winds exceed 20 mph. • Limit area subject to excavation, grading, and other construction activity at any one time.			
	AIR-2: The applicant shall implement control measures during construction to mitigate NOx and ROG emissions from construction equipment. • Contractor shall keep all diesel equipment tuned and maintained. • Use alternative fueled or catalyst equipped diesel construction equipment where feasible. • Minimize idling time to a maximum of 5 minutes. • Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set), where feasible. • Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak-hour of vehicular traffic on adjacent roadways. • Implement activity management, such as rescheduling activities to reduce short-term impacts and limiting the hours of operation of heavy duty equipment and/or the amount of equipment in use.	Contractor	Construction Inspector	During construction
	AIR-3: Implementation Plans prepared by the applicant, and subsequent development projects, shall comply with Rule 9510 Indirect Source Review. Compliance with Rule 9510 would require reductions of 20% of the NOx construction emissions and 45% of the PM10 construction exhaust emissions. In addition, Compliance with Rule 9510 will require reductions of 33.3% of the NOx operational emissions and 50% of the PM10 construction	Contractor	Construction Inspector	During construction

MITIGATION MONITORING AND REPORTING PROGRAM (continued)

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/Reporting Responsibility	Timing
	emissions. Any excess emissions above the SJVAPCD threshold shall require mitigation fees (currently $9,350/ton for NOx emissions for year 2008 and beyond, and $9,011/ton for PM10 emissions for year 2008 and beyond) to achieve NOx and/or PM10 reductions from other sources in the air district.			
	AIR-4: The applicant shall require implementation of all feasible energy efficiency and GHG reduction measures, including but not limited to the following: *Energy Efficiency* • Design buildings to be energy efficient. Site buildings will take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use. • Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings. • Install light colored "cool" roofs, cool pavements, and strategically placed shade trees. • Provide information on energy management services for large energy users. • Install energy efficient heating and cooling systems, appliances and equipment, and control systems. • Install light emitting diodes (LEDs) for street and other outdoor lighting. • Limit the hours of operation of outdoor lighting where not required for security. • Provide education on energy efficiency. *Renewable Energy* • Install solar and wind power systems, solar and tankless hot water heaters, and energy-efficient heating ventilation and air conditioning. Educate consumers about existing incentives. • Use combined heat and power in appropriate applications. *Water Conservation and Efficiency* • Create water-efficient landscapes. • Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls. • Use reclaimed water for landscape irrigation in new developments and on public property. Install the infrastructure to deliver and use reclaimed water. • Design buildings to be water-efficient. Install water-efficient fixtures and appliances.	Contractor	Construction Inspector	During construction

TABLE C-1
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/Reporting Responsibility	Timing
Biological Resources	*Solid Waste Measures* • Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). • Provide interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas. • Provide education and publicity about reducing waste and available recycling services. *Transportation and Motor Vehicles* • Limit idling time for commercial vehicles, including delivery and construction vehicles. • Use low or zero-emission vehicles, including construction vehicles. • Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride sharing vehicles, and providing a web site or message board for coordinating rides. • Provide information on all options for individuals and businesses to reduce transportation-related emissions. Provide education and information about public transportation. ***Air Quality*- ADDITIONAL AIR QUALITY IMPROVEMENT MEASURES ARE ADDED TO THE ADOPTED IS/MND AS APPENDIX F. THESE MEASURES ARE SHOWN IN EXHIBIT 2 OF THE 15096 REPORT.** **BIO-1a:** Prior to initiating any phase of the proposed project, a special-status plant survey shall be conducted by a JPA biologist to determine if rose-mallow, Mason's lilaeopsis, or Sanford's arrowhead occur within Weber Slough. The survey shall consist of at least two separate visits between the months of April to November. If special-status plants species are discovered during the survey, Mitigation Measure BIO-1b shall be implemented. **BIO-1b:** For areas where the JPA has identified special-status plants, the SJMSCP requires the following: I. Complete avoidance of plant populations on site is required for the following plant species in accordance with the identified measures in Section 5.5.9(F): Large flowered fiddleneck, succulent owl's clover, legenere, Greene's tuctoria, diamond-petaled poppy, Sanford's arrowhead, Hospital Canyon larkspur, showy madia, Delta button celery, Slough thistle. II. If one of the following SJMSCP Covered Plant Species is identified by the JPA on a project site, the following mitigation measures are required: **A. For widely distributed plant species:** Mason's lilaeopsis, California hibiscus, Suisun marsh aster, Delta tule pea, Delta mudwort: **i. Attempt acquisition.** If the plant population is considered healthy by the JPA with the concurrence of the Permitting Agencies'	Developer	Planning Department	14 to 30 days prior to construction

MITIGATION MONITORING AND REPORTING PROGRAM (continued)

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/Reporting Responsibility	Timing
	representatives on the TAC, then the parcel owner shall be approached to consider selling a conservation easement including a buffer area as prescribed in Section 5.4.4 and sufficient to maintain the hydrological needs of the plants. Alternatively, the landowner may be approached to consider land dedication in-lieu of paying SJMSCP development fees. If the Project Proponent is not agreeable to acquisition, then compensation shall be prescribed as specified in Section 5.3.1 of the SJMSCP.			
	BIO-2: Giant garter snake For areas identified as potential giant garter snake habitat, the SJMSCP requires the following: • Construction shall occur during the active period for the snake, between May 1 and October 1. Between October 2nd and April 30th, the JPA, with the concurrence of the Permitting Agencies' representatives of the TAC, shall determine if additional measures are necessary to minimize and avoid take. • Vegetation clearing shall be limited within 200-feet of the of potential giant garter snake aquatic habitat to the minimal area necessary unless otherwise approved by the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) Technical Advisory Committee (TAC). • When and if required, the work areas within Weber Slough shall be dewatered and kept dry for at least 15 days prior to the start of construction. The official start of the 15 day count will be dictated by a qualified wildlife biologist to ensure the habitat has been adequately dewatered and remains dry for the entire 15 day period. Once construction in these areas has begun, the area will remain disturbed until construction is complete. If construction activities are idle for more than two days, construction will be delayed until the completion of another 15 day count. • Movement of heavy equipment within 200-feet of the banks of potential giant garter snake aquatic habitat shall be confined to existing roadways to minimize habitat disturbance. • Prior to ground disturbance, all on-site construction personnel shall be given instruction regarding the presence of SJMSCP Covered Species and the importance of avoiding impacts to these species and their habitats. • In areas where wetlands, irrigation ditches, marsh areas or	Developer	Construction Inspector	During construction

TABLE C-1
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/Reporting Responsibility	Timing
	other potential giant garter snake habitats are being retained on the site: • Temporary fencing shall be installed at the edge of the construction area and the adjacent wetland, marsh, or ditch; • Working areas, spoils, and equipment storage and other project activities shall be restricted to areas located outside of marshes, wetlands, and ditches; and • Hay bales, filter fences, vegetative buffer strips, or other accepted equivalents shall be employed to maintain water quality and limit construction runoff into wetland areas. • Pre-construction surveys for the giant garter snake (conducted after completion of environmental reviews and prior to ground disturbance) shall occur within 24-hours of ground disturbance.			
	BIO-3: Burrowing owl At least 14 but no more than 30 days prior to ground disturbing activities, a pre-construction survey for burrowing owls shall be conducted per SJMSCP Incidental Take and Minimization Measure 5.2.4.15. If no owls are found, no further action is necessary. If owls are found: *During the non-breeding season* (September 1 through January 31) burrowing owls occupying the project site shall be evicted from the project site by passive relocation as described in the California Department of Fish and Game's Staff Report on Burrowing Owls (Sept., 1995) *During the breeding season* (February 1 through August 31) occupied burrows shall not be disturbed and shall be provided with a 75-meter protective buffer until and unless the Technical Advisory Committee (TAC), with the concurrence of the Permitting Agencies' representatives on the TAC; or unless a qualified biologist approved by the Permitting Agencies verifies through non-invasive means that either: 1) the birds have not begun egg laying, or 2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. Once the fledglings are capable of independent survival, the burrow can be destroyed.	Project Applicant	Planning Department	Prior to building permit
	BIO-4: Swainson's hawk Because the project site is located less than one mile from a Swainson's hawk nest that has been active within the last five years, the following Incidental Take Minimization Measure as stated in the SJMSCP shall be implemented during construction activities: • If a nest tree becomes occupied during construction activities, then all	Project Applicant	Planning Department	Prior to building permit

MITIGATION MONITORING AND REPORTING PROGRAM (continued)

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/Reporting Responsibility	Timing
	construction activities shall remain a distance of two times the drip line of the tree, measured from the nest. • If the Project Proponent elects to remove a nest tree, then nest trees may be removed between September 1 and February 15, when the nests are unoccupied. If potential nest sites are found: *During the non-breeding season* (August 1 through March 19) and potential nest tree is retained, tree should be monitored throughout breeding season to assess if Swainson's hawks occupy the nest. If the nest becomes active during the breeding season then the *During the breeding season conditions* must be met. *During the breeding season* (March 20 through July 31) nest shall be verified as a Swainson's hawk nest by a qualified biologist. Once the nest is verified by non-invasive means, it shall not be disturbed and construction activities must occur outside of a buffer of two times the dripline of the tree, measured from the nest.			
	BIO-5a: For impacts to riparian habitat, the following SJMSCP requirements shall be followed: • Require appropriate erosion control measures (e.g., hay bales, filter fences, vegetative buffer strips or other accepted equivalents) to reduce siltation and contaminated runoff from project sties. • Retain emergent (rising out of water) and submergent (covered by water) vegetation. • Retain vegetation as practical within the constraints of the proposed development as determined by the JPA with the concurrence of the Permitting Agencies' representatives on the TAC. Rapidly sprouting plants, such as willows, should be cut off at the ground line and root systems left in tact, when removal is necessary. • Locate roadways and other facilities perpendicular, rather than adjacent, to waterways to reduce the total riparian area disturbed wherever practical within the constraints of the proposed development as determined by the JPA with the concurrence of the Permitting Agencies' representatives on the TAC. • Provide construction buffers of at least 100-feet throughout the construction process. This buffer area should be marked with stakes, fencing or other materials which will be visible to construction workers, including heavy equipment operators. This buffer may be reduced on a case-by-case basis by the JPA with the concurrence of the Permitting Agencies' representatives on the TAC.	Project Applicant	Planning Department	Prior to building permit

TABLE C-1
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/Reporting Responsibility	Timing
	BIO-5b: A Section 1602 Streambed Alteration Agreement (SAA) from CDFG shall be obtained prior to the onset of construction related activities for the removal of riparian vegetation and/or alteration of the streambed within Weber Slough. The project applicant shall abide by the conditions of the SAA.	Project Applicant	Planning Department	Prior to building permit
	BIO-6a: Prior to initiating any phase of the proposed project, a formal wetland delineation in areas along Weber Slough shall be conducted. This assessment shall be conducted by a wetland specialist trained in the delineation of wetlands according to methods accepted by the USACE. It is recommended that the assessment occur no more than two years prior to the start of mining operations in that phase since wetland delineations are generally only considered valid for two to five years. This timing is to attempt to ensure that site conditions do not change between the delineation and the start of site development. This assessment shall, at a minimum, include the identification and mapping of any wetland vegetation and a description of hydrologic flows into and out of areas with wetland vegetation. If potentially jurisdictional wetlands occur in areas affected by the project, a wetland delineation report shall be prepared and submitted to the USACE for verification.	Project Applicant	Planning Department	Prior to building permit
	BIO-6b: As project activities would impact Weber Slough, a Waters of the US, the applicant shall be required to obtain a Section 404 (Clean Water Act) permit from the USACE and a Section 401 permit from the RWQCB prior to the onset of construction related activities. The project applicant shall avoid or reduce such impacts to the maximum extent possible and mitigate the loss of wetlands as a result of the proposed project by complying with the USACE "no net loss" policy (e.g., purchasing mitigation credits for created wetlands at a USACE-approved wetland mitigation bank at no less than a 1:1 ratio). The project applicant shall abide by the conditions of the Section 404 and 401 permit.	Project Applicant	Planning Department	Prior to building permit
	BIO-7: It is anticipated that the Arch Road Industrial Project would be approved for participation in the SJMSCP. Compliance with the SJMSCP would provide for impact avoidance measures (e.g., pre-construction surveys during appropriate seasons for identification, construction set-backs, restriction on construction timing) and mitigation for loss of habitat for all species that may be affected by this impact. Impact avoidance measures would include, but are not limited to, the species-specific measure presented above (BIO-1, BIO-2, BIO-3, BIO-4 and BIO-5a). Additionally, an in-lieu fee of $13,022 per acre impacted (since habitat is designated as Agriculture under the SJMSCP) will be required. If construction of Arch Road Industrial Project is not approved for participation in the SJMSCP, then the project proponent shall obtain the necessary individual permits and shall conduct the pre-construction surveys and	Project Applicant	Planning Department	Prior to building permit

MITIGATION MONITORING AND REPORTING PROGRAM (continued)

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/Reporting Responsibility	Timing
	avoidance and minimization measure required in those permits, which are expected to be consistent with the SJMSCP. Should pre-construction surveys find that habitat is occupied for any of the covered species, the project proponent shall implement avoidance and minimization measures using performance criteria consistent with those found in the SJMSCP, prepare reports documenting the surveys and avoidance and minimization measures which shall be submitted for review to the appropriate regulatory agency (CDFG or USFWS).			
Cultural Resources	**CUL-1: Monitoring by a qualified archaeologist and Native American representative during excavation activities.** Prior to issuance of a grading permit, an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology shall be retained by the applicant to monitor all excavation activities, including mass grading and excavation for building footings, etc. . The duration and timing of monitoring shall be determined by the qualified archaeologist in consultation with the applicant and the City and based on the grading plans. In the event that cultural resources are unearthed during excavation activities, the archaeological monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of the find so that the find can be evaluated. Due to the sensitivity of the project area for Native American resources, at least one Native American monitor shall also monitor all excavation activities in the project area. Selection of monitors shall be made by agreement of the Native American groups identified by the Native American Heritage Commission as having affiliation with the project area.	Contractor	Construction Inspector & Archaeological Monitor	During construction
	CUL-2: Cease Work if Prehistoric, Historic or Paleontological Subsurface Cultural Resources are Discovered During Ground-Disturbing Activities. If cultural resources are encountered, all activity in the vicinity of the find shall cease until it can be evaluated by the archaeological monitor. If the archaeological monitor determines that the resources may be significant, the archaeological monitor will notify the Applicant and the City and will develop an appropriate treatment plan for the resources. The archaeologist shall consult with Native American monitors or other appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources if the resources are prehistoric or Native American in nature. In considering any suggested mitigation proposed by the archaeologist in order to mitigate impacts to cultural resources, the project proponent will determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) will be instituted. Work may proceed on other parts of the project site while mitigation for cultural resources is being carried out.	Contractor	Construction Inspector & Archaeological Monitor	During construction

TABLE C-1
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/Reporting Responsibility	Timing
	CUL-3: Halt Work if Human Skeletal Remains are Identified During Construction. If human skeletal remains are uncovered during project construction, the project proponent (depending upon the project component) will immediately halt work, contact the San Joaquin County coroner to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.5 (e)(1) of the CEQA Guidelines. If the County coroner determines that the remains are Native American, the project proponent will contact the NAHC, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). Per Public Resources Code 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section (PRC 5097.98), with the most likely descendents regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.	Contractor	Construction Inspector & Archaeological Consultant	During construction
Hydrology and Water Quality	**HYDRO-1:** During construction and grading, erosion and sediment control measures will be conducted in accordance with City of Stockton's stormwater management requirements and best management practices for the reduction of pollutants in runoff (City of Stockton, City of Stockton General Plan Background Report. Adopted January 22, 1990; City of Stockton, Stormwater Division, Model Storm Water Pollution Prevention Plan for Construction Activities. May 15, 1997). The proposed project would be subject to NPDES requirements and would require the acquisition of a NPDES general construction permit (State Water Resources Control Board [SWRCB], NPDES, General Construction Permit Requirements). The owner, developer, and/or successors-in-interest (ODS) is required to file a notice of intent (NOI) with the State Water Resources Control Board (SWRCB) prior to commencement of construction activity. Upon receipt of the completed NOI the ODS will be sent a receipt letter containing the Waste Discharger's Identification Number (WDID) from the SWRCB to be submitted prior to issuance of a Grading Permit or plan approval. A stormwater pollution prevention plan (SWPPP) shall be prepared for the project. The SWPPP shall include Best Management Practices (BMPs) to control sediment discharge and pollutant run-off from construction activities and shall also include an erosion control plan. The SWPPP is required to be available onsite. The proposed project must also comply with the Stormwater Quality Control Criteria Plan, as outlined in the City's Phase 1 Stormwater NPDES permit issued by the California Water Quality Control Board, Central Valley Region (Order No. R5-2002-0181). In addition, the City's Stormwater Quality Control	Contractor	Construction Inspector	Prior and during construction

MITIGATION MONITORING AND REPORTING PROGRAM (continued)

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/Reporting Responsibility	Timing
	Criteria Plan requires that the ODS of a commercial project execute a Maintenance Agreement with the City prior to receiving a Certificate of Occupancy. The ODS must remain the responsible party and provide funding for the operation, maintenance, and replacement costs of the proposed treatment devices built for the subject project.			
	HYDRO-2: The Applicant shall prepare a Master Drainage Plan for the project site. The Drainage Plan should incorporate measures to minimize the increased runoff during peak conditions and shall calculate and demonstrate the required volume of the off-site detention basin. The applicant will implement measures provided in the Drainage Plan. A detailed drainage report shall be prepared by a registered civil engineer prior to site development. The report shall include the following items: • An assessment of existing drainage facilities within the project vicinity, and an inventory of necessary upgrades, replacements, redesigns, and/or rehabilitation. • A description of the proposed maintenance program for the project drainage system. • Standards for drainage systems to be installed on a project-specific basis. • The drainage system shall be designed to meet standards in the Stockton Municipal Code and the City of Stockton Department of Public Works Standard Specifications (current edition). The Drainage Plan shall include, and the Applicant shall implement, a schedule for identified drainage improvements. In addition, when approving specific developments that may result in increased drainage flows on the project site, the Applicant shall concurrently implement any necessary drainage improvements such that new development does not exceed the capacity of drainage facilities. The proposed project will also be required to provide post construction Best Management Practices (BMP's) as part of the projects design per City of Stockton Code 7-859 to prevent and contain surface water runoff.	Project Engineer	Public Works Department	Prior to final improvement plans
Land Use	**LU-1a:** Provide stormwater management facilities in accordance with FAA criteria for preventing the creation of wildlife attractants near airports. To prevent the creation of potential wildlife attractants, design stormwater detention basin using the following criteria set forth by FAA in accordance Advisory Circular 5200-33B, "Wildlife attractants on or near Airports:" • Prevent the creation of open-water sources to the greatest extent possible. Design, engineered, constructed, and maintained any detention ponds to drain within 24-48 hours following the 100-year	Project Engineer	City of Stockton	Prior to final improvement plans

TABLE C-1
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/Reporting Responsibility	Timing
	storm event and to remain completely dry between storms. • Provide narrow, linear ponds with steep-slopes (1:1 ratio). • Ensure that all vegetation and landscaping materials do not provide a food, cover or habitat for potentially hazardous wildlife. • Consult with Stockton Metropolitan Airport and Caltrans Aeronautics Division to review stormwater management plans prior to final design.			
	LU-1b: Buildings and structures are not to exceed 150 feet in height.	Project Engineer	City of Stockton	Prior to final improvement plans
Noise	**Noise-1:** The applicant shall implement the following measures: • Construction activities shall be limited to between 7:00 a.m. and 7:00 p.m. Monday through Saturday to avoid noise-sensitive hours of the day. Construction activities shall be prohibited on Sundays and holidays. • Construction equipment noise shall be minimized during project construction by muffling and shielding intakes and exhaust on construction equipment (per the manufacturer's specifications) and by shrouding or shielding impact tools. Construction contractors shall locate fixed construction equipment (such as compressors and generators) and construction staging areas as far as possible from nearby residences.	Contractor	Construction Inspector	During construction
	Noise-2: To further address the nuisance impact of project construction, construction contractors shall implement the following: • Signs will be posted at the construction site that include permitted construction days and hours, a day and evening contact number for the job site, and a contact number with the City of Stockton in the event of problems. • An onsite complaint and enforcement manager shall track and respond to noise complaints.	Contractor	Construction Inspector	During construction
	Noise-3: HVAC units shall be located away from nearby residences, on building rooftops, and properly shielded by either the rooftop parapet or within an enclosure that effectively blocks the line of site of the source from the nearest receivers and shall comply with City of Stockton and San Joaquin County noise ordinance standards for stationary sources.	Project Architect/Engineer	Building Department	Plan check

MITIGATION MONITORING AND REPORTING PROGRAM (continued)

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/Reporting Responsibility	Timing
	~~**Noise-4:** The applicant shall require project buildings on Lots that are adjacent to a residential land use to be oriented such that the loading docks would be on the side of the building furthest from the residence. Buildings on Lot A would have loading docks located on the south side. Buildings on Lot C, E, and H would have loading docks located on the south side, and buildings on Lot G would have loading docks located on the south or east side of the respective building structures.~~	**MITIGATION MEASURES Noise-4 and Noise-5 DELETED, INAPPLICABLE TO PROJECT**		
	~~**Noise-5:** The applicant shall construct a 6-foot noise wall along the project Lot G western edge, to block the line-of-site between the adjacent residence and Newcastle Road traffic and Lot G facility operations~~.	**ADDED PUBLIC SERVICES MEASURE: The developer shall incorporate Early Suppression Fast Response fire sprinkler systems in the project building design andconstruction. The Stockton Fire Department shall review and approve such systems prior to their installation**		
Transportation and Traffic	**TRAF-1:** The project applicant shall contribute its fair share to the construction of a free northbound right-turn lane at the intersection of Arch-Airport Road and SR 99 Ramps. With construction of this improvement, additional capacity would be provided, resulting in acceptable operations during the AM and PM peak hours, reducing the project's impact to a less-than-significant level.	Project Applicant	Planning Department	Prior to operation
	TRAF-2: The project applicant shall contribute its fair share to the construction improvements that would result in acceptable operations at the intersection of Arch Road and Newcastle Road, including construction of a third westbound through lane and modifications to the southbound approach to provide a left-turn lane, through lane, and a right-turn only lane. The westbound left-turn lane and northbound left-turn lane should be designed to provide 300 feet of vehicle storage. The traffic signal would need to be modified to provide protected north/south phasing. Additionally, the project applicant shall install fiber optic cabling interconnect from where the project starts in the west to the intersection of Fite Court and Arch Road on the south side of Arch Road. With implementation of this improvement, the intersection would operate at an acceptable level of service during the PM peak hour, therefore reducing the project's impact to a less-than-significant level.	Project Applicant	Planning Department	Prior to operation
	~~**TRAF-3a:** The project applicant shall provide access to Frontier Way. When Frontier Way is extended to the south of Arch Road and that property developed, the internal roadway should connect to Frontier Way to allow vehicles from the site traveling west towards SR 99 an alternative exit. The Frontier Way/Arch Road intersection has sufficient excess capacity to accommodate the added traffic from the project site while maintaining acceptable operations. With the Frontier Way connection, operation of the side-street would improve from LOS F to LOS D and signal warrants would not be satisfied during the peak hour.~~	**MITIGATION MEASURES TRAF-3A DELETED, INAPPLICABLE TO PROJECT**		
	Or:			
	TRAF-3b: The project applicant shall signalize the driveway. Signalization of the driveway would result in acceptable levels of service at this driveway.			

TABLE C-1
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/Reporting Responsibility	Timing
	Depending on the driveway's ultimate proximity to the Arch Road/Newcastle Road intersection, the intersection spacing may not be sufficient to provide a signalized access at this location. Signalization would result in LOS B during the PM peak hour. Implementation of either Mitigation Measure 3a or Mitigation Measure 3b would result in acceptable service levels at this intersection, reducing the impact to a **less-than-significant** level.			

EXHIBIT 4

BASECAMP CEQA ADEQUACY REVIEW

CEQA ADEQUACY REVIEW OF THE ADOPTED INITIAL STUDY/ MITIGATED NEGATIVE DELARATION

FOR THE

ARCHTOWN INDUSTRIAL PROJECT

Stockton, CA

December 30, 2020

Prepared for:

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1.0 INTRODUCTION

1.1 Review Summary

This review is an analysis of the Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Archtown Industrial Project (project). This document, the *Archtown Industrial Project Initial Study and Proposed Mitigated Negative Declaration #PO9-148*, was prepared by ESA and adopted by the City of Stockton (City) in 2010. The proposed project is the annexation of four parcels into the City and the subsequent development of these parcels for light industrial and warehouse uses. The project location and site plan are shown in Figures 1-1, 1-2 and 1-3.

Since adoption of the IS/MND, the CEQA Environmental Checklist in CEQA Guidelines Appendix G, which was the basis for the IS/MND, has undergone several revisions, adding questions for environmental issues previous not in the checklist, while also revising or deleting existing questions. This review evaluates the adequacy of the IS/MND analysis of environmental impacts of the project with the revisions to the CEQA Environmental Checklist. Where the adopted IS/MND does not directly address environmental issues in the revised CEQA checklist, this review provides additional information and analysis from applicable sources to address the issue.

1.2 Project Description

The Archtown Industrial Development proposes annexation of four parcels totaling approximately 79 acres into the City of Stockton. The proposed annexation area is located at the southwestern corner of the intersection of Arch Road and Newcastle Road, adjacent to and south of the Stockton city limits. The parcels consist of Assessor's Parcel Numbers (APNs) 181-110-02, 181-110-04, 181-110-06, and 181-110-07. Also included in the proposed annexation are 640 linear feet of adjacent Newcastle Road right-of-way.

The project site is currently within the jurisdiction of San Joaquin County, with a County General Plan designation of General Agriculture and a zoning designation is AG-40 (General Agriculture; 40-acre minimum parcel size). However, the project site is designated as Industrial in the City of Stockton General Plan, as is much of the surrounding area. As part of the annexation, the City proposes to pre-zone the project site as IL – Industrial, Limited, as well as a lot line adjustment. The pre-zoning and lot line adjustment would allow for the Archtown Industrial Development, which proposes approximately 1.2 million square feet of development for light industrial/warehouse uses. It is anticipated that this development would consist of one building.

Planned site development would include frontage improvements along Arch Road and Newcastle Road, and utility (water, sewer, storm drainage) extensions to serve the proposed parcels. Two approximately 5-½-acre detention basins would be installed in the northern portion of the project site adjacent to Arch Road. These detention basins would

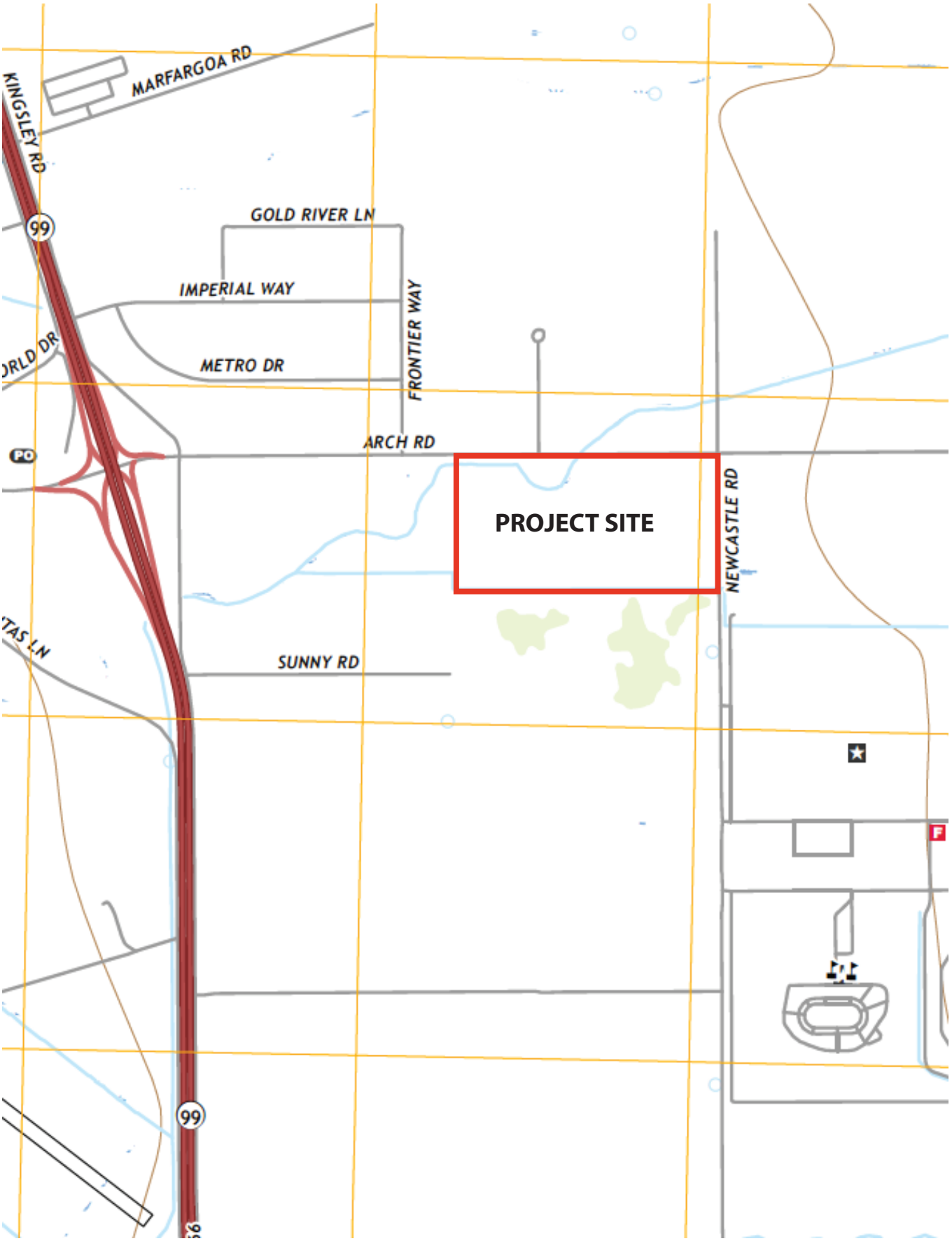
serve the project site and the 60-acre parcel to the east. Initially, the detention basins would be connected to the existing detention basin on the north side of Arch Road, and storm water would then be released into Weber Slough. In the long term, it is proposed that the detention basins would connect to Weber Slough through a new storm water outfall structure. Project-related work potentially affecting Weber Slough includes construction of the detention basins, the outfall structure, boring under the slough for the 12-inch diameter water line, and the placement of a new 27-inch diameter sanitary sewer line in Arch Road.

1.3 Approach to the Project Analysis

The project's potential environmental effects, and the degree to which these effects are addressed in the adopted IS/MND, are evaluated in Chapter 2.0. The review is based on environmental impact considerations included in the most recently adopted Appendix G of the CEQA Guidelines. For each question, Chapter 2.0 determines whether the issue was addressed in the adopted IS/MND and whether the project would involve: 1) a Potentially Significant Impact, 2) a Less Than Significant Impact with Mitigation Incorporated, 3) a Less Than Significant Impact, or 4) No Impact, which are defined as follows:

> A Potentially Significant Impact occurs when there is substantial evidence that the project would involve a substantial adverse change to the physical environment, i.e., that the environmental effect may be significant, and mitigation measures have not been defined that would reduce the impact to a less than significant level. If there is at least one Potentially Significant Impact identified, an EIR may be required.
>
> An environmental effect that is Less Than Significant with Mitigation Incorporated is a Potentially Significant Impact that can be avoided or reduced to a level that is less than significant with the application of mitigation measures.
>
> A Less Than Significant Impact occurs when the project would involve environmental effects but not a substantial adverse change to the physical environment. No mitigation measures would be required.
>
> A determination of No Impact is self-explanatory.

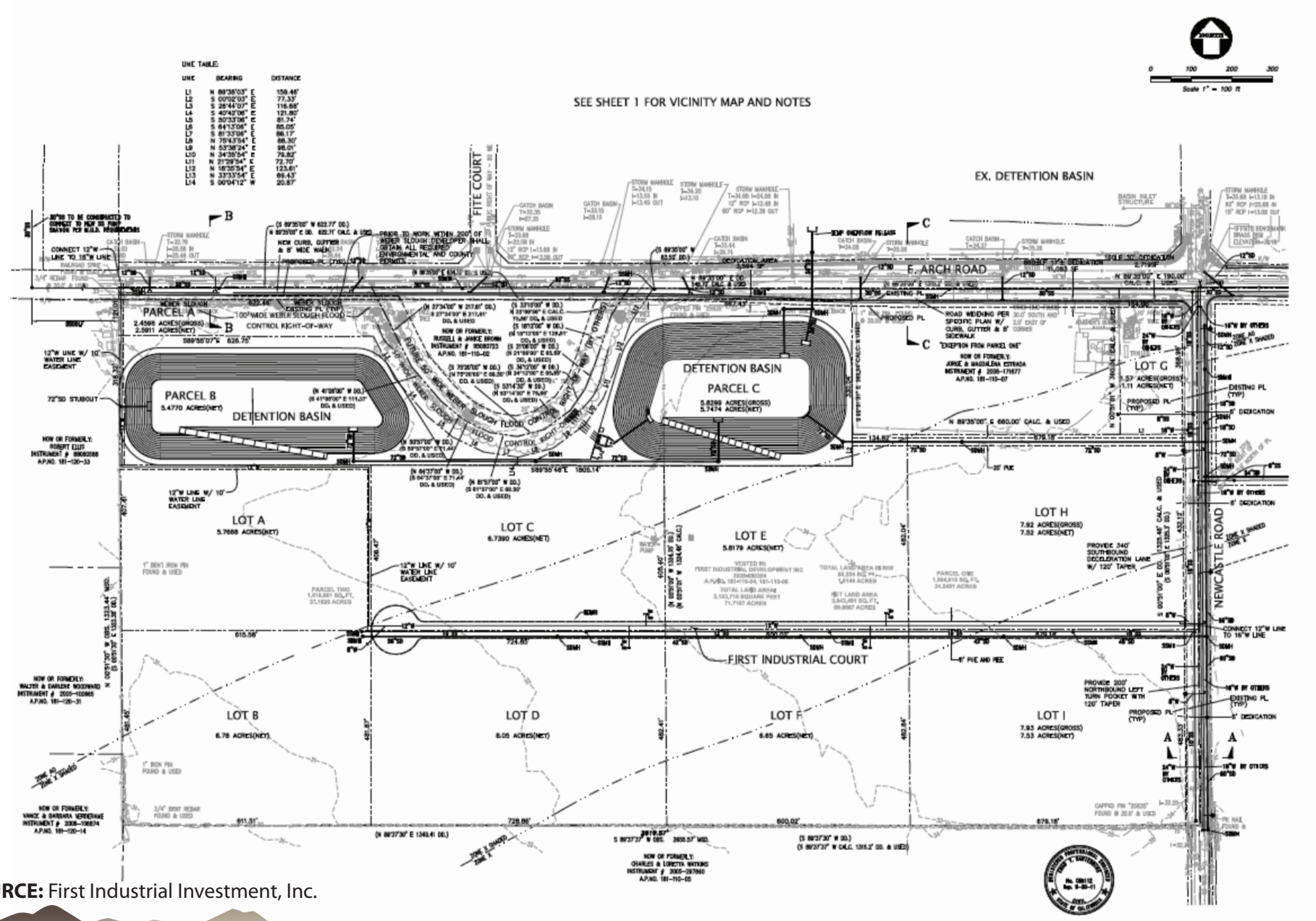
The review also evaluates the adequacy of mitigation measures identified in the adopted IS/MND in addressing potentially significant impacts, or whether new analysis presented in this review involves significant environmental effects that require mitigation. If necessary, additional mitigation would have been proposed; however, this review has determined that existing mitigation measures in the adopted IS/MND are adequate to reduce the project's potentially significant environmental effects to a less than significant level, and no new mitigation measures are required.



BaseCamp Environmental

Figure 1-1
VICINITY MAP

Figure 1-2
AERIAL PHOTO



SOURCE: First Industrial Investment, Inc.

Figure 1-3
ARCHTOWN TENTATIVE MAP

2.0 ENVIRONMENTAL CHECKLIST

2.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			✓	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			✓	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			✓	

Environmental Impacts and Mitigation Measures

a) Scenic Vistas.

The adopted IS/MND concluded that project impacts were Less Than Significant, as there are no scenic vistas and no notable geographic features as identified by the San Joaquin County General Plan. The IS/MND adequately describes potential scenic vista impacts. It should be noted that the current Stockton General Plan, adopted in 2018, also does not designate scenic vistas in the area. This review concurs with the adopted IS/MND that project impacts on scenic vistas would be *Less Than Significant*.

b) Scenic Routes and Resources.

The adopted IS/MND concluded that the project would have No Impact on this issue, as no scenic highways designated by Caltrans are in the project vicinity, and neither Arch Road nor Newcastle Road have been designated scenic highways by the City, County or State. The adopted IS/MND adequately describes potential scenic routes and resources impacts. This review concurs with the adopted IS/MND that the project would have *No Impact* on scenic routes and resources.

c) Visual Character and Quality.

The adopted IS/MND concluded that project impacts on visual character and quality were Less Than Significant, as the project would be visually similar to other projects in the area that are industrial in character and the change in land use on the site from agriculture to industrial operations would not degrade the existing visual character or quality of the area. The project would be subject to more stringent site plan and architectural design review under current City standards, which would reduce potential for impact. The current Stockton General Plan identifies open space, agricultural fields, and riparian areas, particularly along the San Joaquin River and the Calaveras River, as significant visual features.

The project would convert an agricultural field to urban uses. However, the adopted IS/MND adequately describes the anticipated visual character of the project site and vicinity, along with potential aesthetic impacts. This review concurs with the IS/MND that project impacts on visual character and quality would be *Less Than Significant.*

d) Light and Glare.

The adopted IS/MND concluded that potential project impacts on light and glare were Less Than Significant, as few land uses sensitive to changes in lighting are in the vicinity, and the project would be required to meet City standards for exterior lighting. The adopted IS/MND adequately describes these impacts. It should be noted that Stockton Municipal Code Section 16.32.070 establishes standards to prevent spillover illumination or glare onto adjoining properties and prohibit interference with the normal operation or enjoyment of adjacent property. This review concurs with the adopted IS/MND that project impacts related to light and glare would be *Less Than Significant.*

2.2 AGRICULTURE AND FORESTRY RESOURCES

Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			✓	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?			✓	
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				✓
d) Result in the loss of forest land or conversion of forest land to non-forest use?				✓

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

Environmental Impacts and Mitigation Measures

a) Agricultural Land Conversion.

The adopted IS/MND concluded that project impacts on agricultural land conversion were Less Than Significant. Although land on the project site is designated Prime Farmland and Farmland of Statewide Importance, impacts related to Farmland conversion were analyzed in the Stockton General Plan EIR in 2007, and CEQA Guidelines Section 15183 states that "projects which are consistent with the development density established by existing zoning, community plan, or general plan polices for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site."

The adopted IS/MND adequately describes impacts, including the application of CEQA Guidelines Section 15183 and the note that all environmental impacts relating to agriculture were analyzed and mitigated in the City's General Plan Update EIR of 2007. Although the EIR referred to in the IS/MND was certified in 2007, the City's more recent General Plan Update EIR, certified in 2018, also adequately analyzed impacts on agricultural resources. No project-specific impacts related to this issue were identified. This review concurs with the adopted IS/MND that project impacts would be *Less Than Significant* with the application of CEQA Guidelines Section 15183.

b) Agricultural Zoning and Williamson Act.

The adopted IS/MND concluded that project impacts on agricultural zoning and Williamson Act were Less Than Significant, as agricultural zoning on the project site would be changed upon annexation, and the project site is not under a Williamson Act contract. The adopted IS/MND adequately describes impacts. This review concurs with the adopted IS/MND that project impacts on agricultural zoning and Williamson Act would be *Less Than Significant.*

c) Forest Land Zoning.

Forest land zoning was not discussed in the IS/MND, as this item was added to the CEQA Environmental Checklist after IS/MND adoption. The project site is not used, zoned, or otherwise designated for forestry use. Therefore, the project would have *No Impact* related to zoning of forest or timber land.

d) Forest Land Conversion.

Forest land conversion was not discussed in the IS/MND, as this item was added to the CEQA Environmental Checklist after IS/MND adoption. The project site has no forest land; therefore, no conversion of forest land would occur. The project would have *No Impact* related to forest land conversion.

e) Indirect Conversion of Farmland and Forest Land.

The adopted IS/MND concluded that project impacts on indirect conversion of farmland and forest land were Less Than Significant, as it was considered unlikely that the project would lead to the conversion of adjacent farmland. The adopted IS/MND adequately describes potential impacts related to indirect conversion of Farmland. This review concurs with the adopted IS/MND that project impacts related to indirect conversion of Farmland would be *Less Than Significant.*

As noted, questions on forest land were added to the CEQA Environmental Checklist after IS/MND adoption. There is no designated forest land in the project vicinity, so the project would have no impact related to indirect conversion of forest land.

2.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable Air Quality Attainment Plan?		✓		
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?				✓
c) Expose sensitive receptors to substantial pollutant concentrations?			✓	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✓	

Environmental Impacts and Mitigation Measures

a) Air Quality Plan Consistency.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated, as project operational emissions of NOx and PM10 exceeded SJVAPCD significance thresholds but could be mitigated with measures specified in the IS/MND. At the time the IS/MND was adopted, the San Joaquin Valley Air Basin, within which the project is located, was determined to be in nonattainment of federal and State air quality standards for ozone, PM10, and PM2.5. Since adoption of the IS/MND, the Air Basin is now in attainment of the federal air quality standard for PM10; however, the Air Basin is now designated "Extreme" nonattainment for the federal 8-hour ozone standard, as opposed to "Severe" at the time of IS/MND adoption. The Air Basin status for all other federal and State air quality standards for criteria pollutants has remained the same.

Air pollutant emissions estimates that would be generated by construction and operation of the project were updated using the CalEEMod computer modeling program, the program currently accepted by the SJVAPCD for CEQA analysis in place of the URBEMIS model used by the IS/MND. The results of the analysis are provided in Table 2-1, along with the SJVAPCD thresholds to determine the significance of project emissions for CEQA purposes. Since the IS/MND was adopted, the SJVAPCD adopted a revised Guide to Assessing and Mitigating Air Quality Impacts, which set forth revised significance thresholds for project emissions of criteria pollutants. The revised thresholds are provided in Table 2-1. Detailed air quality modeling results are shown in the Appendix, which contains an Air Quality/Greenhouse Gas Emissions Report for the project.

TABLE 2-1
SJVAPCD SIGNIFICANCE THRESHOLDS AND
ESTIMATED AIR POLLUTANT EMISSIONS

	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
SJVAPCD Significance Thresholds[1]	**10**	**10**	**100**	**27**	**15**	**15**
Construction Emissions[2]	2.95	4.78	4.19	0.02	0.81	0.36
Above Threshold?	*No*	*No*	*No*	*No*	*No*	*No*
Operational Emissions[3]	4.22	9.62	13.70	0.04	2.61	0.96
Above Threshold?	*No*	*No*	*No*	*No*	*No*	*No*

[1] Applicable to both construction and operational emissions. Figures in tons per year.
[2] Maximum ton emissions in a calendar year.
[3] Tons per year
Notes: ROG – reactive organic gases; NO_x – nitrogen oxide; CO – carbon monoxide; SO_x – sulfur oxide; PM_{10} – particulate matter 10 microns in diameter; $PM_{2.5}$ – particulate matter 2.5 microns in diameter.
Sources: CalEEMod Version 2016.3.2, SJVAPCD 2015a.

As indicated in Table 2-1, construction and operational emissions would not exceed the SJVAPCD significance thresholds. Although project emissions would not exceed significance thresholds, the project would still be subject to SJVAPCD Rule 9510, which as noted above requires construction and operational emission reductions of NO_x and PM_{10}. In addition, dust emissions would be reduced through the required implementation of SJVAPCD Regulation VIII, enforcement of which is the responsibility of the SJVAPCD. Conformance with plans and specifications is monitored by City building inspectors. Regulation VIII contains the required dust emission control measures, which are described in the report in the Appendix.

The adopted IS/MND identified Mitigation Measures AIR-1, AIR-2, and AIR-3. AIR-1 and AIR-3 requires compliance with SJVAPCD rules and regulations, which the project is required to do by regulation. AIR-2 requires actions to reduce construction emissions of ROG and NO_x. Since the CalEEMod run indicates that construction emissions of these pollutants would not exceed SJVAPCD significance thresholds, this mitigation measure does not seem necessary. Nevertheless, as the adopted IS/MND included this mitigation measure, the project applicant is required to implement it, resulting in further reductions of

ROG and NO_x construction emissions. Given this, this review concurs with the adopted IS/MND that project impacts related to air quality plan consistency would be *Less Than Significant with Mitigation Incorporated*.

b) Cumulative Emissions.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated, as emissions would not exceed the SJVAPCD significance thresholds or could be mitigated. The Stockton General Plan 2040 EIR found that, even with the adopted mitigation measures, the cumulative impact of planned urbanization under the Stockton General Plan on ozone precursor emissions would be significant and unavoidable. A Statement of Overriding Considerations was adopted for this impact in conjunction with the approval of the Stockton General Plan 2040.

As indicated in Table 2-1 above, both project construction and operational emissions would not exceed the SJVAPCD significance thresholds established for criteria pollutants. The SJVAPCD significance thresholds were developed, in part, to ensure that project emissions did not interfere with the implementation of air quality management plans designed to ensure that the Air Basin meets federal and State air quality standards. Since the current CalEEMod results also indicate that project operations would not exceed ROG, NOx, and particulate matter significance thresholds, the project would not have a potentially significant cumulative impact on ozone or particulate matter levels in the San Joaquin Valley Air Basin, which is in nonattainment status for both.

It should be noted that the Sanchez-Hoggan project east of the project site was recently approved. This project estimated that traffic activity, a significant contributor to air pollution, would be less than what was estimated for the project site under Stockton General Plan 2040 designations. With the reduced traffic activity from the Sanchez-Hoggan project, cumulative air pollutant emissions in Stockton would be less than estimated by the Stockton General Plan 2040 EIR.

As project emissions would not exceed SJVAPCD significance thresholds, project development would not generate new or more severe air quality impacts that were not analyzed in the Stockton General Plan 2040 EIR. Based on this, this review considers project impacts of cumulative emissions to be *Less Than Significant*.

c) Exposure of Sensitive Receptors.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated, as emissions would not exceed the SJVAPCD significance thresholds or could be mitigated. Project emissions would likely include diesel particulate matter (DPM), which is classified as a Toxic Air Contaminant (TAC). DPM emissions can have adverse health effects on residents if they experience long-term exposure.

Since the project IS/MND was adopted, the SJVAPCD has recommended that projects emitting potentially significant amounts of TACs be screened for potential health impacts on nearby sensitive receptors. A screening-level Health Risk Assessment (HRA) was conducted for the project based on conservative estimates of exposure and emissions. The screening level assessment indicated that the project could have potentially significant

health risk impacts and that a more detailed and refined risk analysis was warranted. Therefore, a more detailed HRA was conducted to determine the carcinogenic risk to nearby sensitive receptors and whether this risk would be significant. The Air Quality/Greenhouse Gas Emissions Report in the Appendix to this review discusses the methodology and results of the more detailed HRA.

The carcinogenic risk is considered significant if the Maximally Exposed Individual risk equals or exceeds 20 in one million. Taking into consideration the anticipated volume and composition of vehicle traffic generated by the project, the HRA concluded that the carcinogenic risk from project construction DPM emissions at nearby receptors would be approximately 5 in one million, well below the significance threshold of 20 in one million.

For project operational DPM emissions, a carcinogenic risk of 5 in one million was identified near the intersection of Arch Road and Frontier Way and along Newcastle Road south of the project site. No higher carcinogenic risk was identified elsewhere in the area. At the residence adjacent to the site, the carcinogenic risk from project operational DPM emissions would be 1 in one million. The operational carcinogenic risk to the CDCR buildings adjacent to Newcastle Road would be no greater than 1 in one million and would be correspondingly less for buildings are a greater distance from the project site. Buildings in the eastern portion of the CDCR site would experience no measurable increase in carcinogenic risk. None of these risk levels would approach or exceed the significance threshold of 20 in one million.

Non-carcinogenic effects are divided into long-term (chronic) health effects such as birth defects, neurological damage, or genetic damage; and short-term (acute) effects such as eye irritation, respiratory irritation, and nausea. Non-carcinogenic hazard indices are expressed as a ratio of expected exposure levels to acceptable exposure levels. For both acute and chronic hazards, a hazard index that exceeds 1 is considered a significant effect. For non-carcinogenic risks related to project operational DPM emissions, the Acute Hazard Index is 0.006 and the Chronic Hazard Index is 0.0148. Both are well below the significance threshold for each.

In summary, sensitive receptors near the project site would not experience exposure to any pollutants, including TACs, that would have a significant adverse impact on health. Project impacts related to exposure of sensitive receptors to emissions would be *Less Than Significant.*

d) Odors.

The adopted IS/MND concluded that project impacts were Less Than Significant, as the project would not involve land uses that would generate substantial and objectionable odors. The IS/MND adequately describes impacts. This review concurs with the adopted IS/MND that project impacts would be *Less Than Significant.*

2.4 BIOLOGICAL RESOURCES

Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Adversely impact, either directly or through habitat modifications, any endangered, rare, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?		✓		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		✓		
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?		✓		
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		✓		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?		✓		

Environmental Impacts and Mitigation Measures

a) Special-Status Species.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated. Several special-status plant and wildlife species were identified as potentially occurring on the project site, such as giant garter snake, Swainson's hawk, and burrowing owl. However, mitigation was identified that would reduce impacts on these species. For this issue, the adopted IS/MND identified Mitigation Measures BIO-1a, BIO-1b, BIO-2, BIO-3, and BIO-4, all of which were summarized from the San Joaquin County open Space and Habitat Conservation Plan (SJMSCP). An additional mitigation measure, BIO-7, anticipates project compliance with the SJMSCP. The adopted IS/MND adequately describes the biological impacts of the project, and all mitigation measures remain applicable to the project. This review concurs with the adopted IS/MND that project impacts related to special-status species would be *Less Than Significant with Mitigation Incorporated.*

b) Riparian and Other Sensitive Habitats.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated. The project could have potential impacts on riparian vegetation along Weber Slough; however, mitigation was identified that would minimize impacts on this vegetation. For this issue, the adopted IS/MND identified Mitigation Measures BIO-5a and BIO-5b to reduce impacts on riparian vegetation along Weber Slough. The adopted IS/MND adequately describes the potential biological impacts of the project, and these mitigation measures remain applicable to the project. This review concurs with the adopted IS/MND that project impacts related to riparian and other sensitive habitats would be *Less Than Significant with Mitigation Incorporated.*

c) Wetlands and Waters of the U.S.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated. Weber Slough on the project site is considered a jurisdictional water; however, mitigation was identified that would reduce project impacts on Weber Slough. The CEQA Environmental Checklist was recently updated to include impacts on state-protected wetlands; however, no wetlands or other waters were identified beyond Weber Slough, impacts on which the adopted IS/MND described. The adopted IS/MND identified Mitigation Measures BIO-6a and BIO-6b to reduce impacts on Weber Slough. These mitigation measures remain applicable to the project. This review concurs with the adopted IS/MND that project impacts related to wetlands would be *Less Than Significant with Mitigation Incorporated.*

d) Fish and Wildlife Movement and Nursery Sites.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated. Installation of a proposed outfall to Weber Slough may minimally alter a potential movement corridor for giant garter snake, which is not currently known to occur in the area, but mitigation would reduce potential impacts. Mitigation Measure BIO-2 would reduce potential impacts on giant garter snake movement. The adopted IS/MND adequately describes these impacts, and the mitigation measure remains applicable to the project. This review concurs with the adopted IS/MND that project impacts related to fish and wildlife movement and nursery sites would be *Less Than Significant with Mitigation Incorporated.*

e) Local Biological Requirements.

The adopted IS/MND concluded that the project would have No Impact on this issue. The City's Tree Preservation Ordinance would not apply to the project, as there are no oak trees on the site protected by the ordinance. The IS/MND adequately describes impacts in this issue area. This review concurs with the adopted IS/MND that the project would have *No Impact.*

f) Conflict with Habitat Conservation Plans.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated, as a mitigation measure requiring compliance with the SJMSCP would be implemented. For this issue, the adopted IS/MND identified Mitigation Measure BIO-7, which anticipates project participation in the SJMSCP, but also requires permits and avoidance and minimization measures equivalent to SJMSCP implementation should the project not participate. The adopted IS/MND adequately describes impacts in this area, and the mitigation measure remains applicable to the project. This review concurs with the adopted IS/MND that project impacts related to habitat conservation plans would be *Less Than Significant with Mitigation Incorporated.*

2.5 CULTURAL RESOURCES

Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?			✓	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		✓		
c) Disturb any human remains, including those interred outside of formal cemeteries?		✓		

Environmental Impacts and Mitigation Measures

a) Historical Resources.

The adopted IS/MND concluded that project impacts were Less Than Significant, as a records search and field survey found no evidence of historical resources on the project site that would be affected by the project. The adopted IS/MND adequately describes impacts on historical resources. This review concurs with the adopted IS/MND that project impacts related to historical resources would be *Less Than Significant.*

b) Archaeological Resources.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated, as unknown resources could exist on the project site, and the site may be sensitive for cultural resources. Mitigation Measures CUL-1 and CUL-2 in the adopted IS/MND would reduce impacts on archaeological resources that may be encountered. The IS/MND adequately describes impacts on cultural resources, and these mitigation measures remain applicable to the project. This review concurs with the adopted IS/MND that project impacts related to archaeological resources would be *Less Than Significant with Mitigation Incorporated.* See Section 2.18 for a discussion of project impacts on tribal cultural resources.

c) Human Burials.

The adopted IS/MND concluded that project impacts with respect to human burials were Less Than Significant with Mitigation Incorporated. While no evidence of human burials on the project site was found, local Native American tribes have indicated the area is culturally sensitive. Mitigation Measure CUL-3 in the adopted IS/MND would reduce impacts on human burials that may be encountered. The adopted IS/MND adequately describes impacts, and this mitigation measure remains applicable to the project. This review concurs with the adopted IS/MND that project impacts related to human burials would be *Less Than Significant with Mitigation Incorporated.* See Section 2.18 for a discussion of project impacts on tribal cultural resources, including burials.

2.6 ENERGY

Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?			✓	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			✓	

Energy impacts were not analyzed in the adopted IS/MND. Since adoption of the IS/MND, the CEQA Environmental Checklist was revised to include questions related to energy consumption and conservation. This section discusses the energy questions added to the Environmental Checklist.

Electricity is a major energy source for residences and businesses in California. In San Joaquin County, based upon the most recent information available, electricity consumption in 2016 totaled approximately 5,457 million kilowatt-hours (kWh), of which approximately 3,698 million kWh were consumed by non-residential uses and the remainder by residential uses (CEC 2018a). In 2016, natural gas consumption in San Joaquin County totaled approximately 195 million therms, of which approximately 115 million therms were consumed by non-residential uses and the remainder by residential uses (CEC 2018b). Motor vehicle use also accounts for substantial energy usage. The SJCOG estimated countywide vehicle miles traveled (VMT) daily was 17,868,785 miles in 2015, which led to the consumption of approximately 511 million gallons of gasoline and diesel fuel (SJCOG 2018a).

The State of California has adopted comprehensive energy efficiency standards as part of its Building Standards Code, California Code of Regulations, Title 24. Part 6 of Title 24 is referred to as the California Energy Code. In 2009, the California Building Standards Commission adopted a voluntary Green Building Standards Code, or CALGreen, which became mandatory in 2011. CALGreen sets forth mandatory measures, applicable to new residential and nonresidential structures as well as additions and alterations, on water efficiency and conservation, building material conservation, and interior environmental quality. It also mentions energy efficiency, although CALGreen defers to the Energy Code

for actions. The City of Stockton has adopted the 2019 versions of both the California Energy Code and CALGreen.

Environmental Impacts and Mitigation Measures

a) Project Energy Consumption.

The project would likely result in the development of 1.2 million square feet of warehouse space, which would consume energy such as electricity and natural gas. Based on information from the U.S. Energy Information Administration (EIA 2015), the proposed project would use approximately 7.9 million kilowatt-hours of electricity and 26.4 million cubic feet of natural gas annually (SJCOG 2018). The proposed buildings would, however, be constructed in accordance with the City-adopted 2019 California Energy Code, which promotes energy efficiency in building operations.

Project construction would also consume energy, mainly equipment and vehicle fuels. Construction work for this project would not be different from work for similar projects; as such, it would be conducted such that there would be no known wasteful, inefficient, or unnecessary energy consumption. The review concludes that project impacts related to energy consumption would be *Less Than Significant.*

b) Consistency with Energy Plans.

The City has not adopted an energy conservation plan; however, a section of its Climate Action Plan describes strategies that promote energy efficiency in new and existing buildings. As noted above, project buildings would be constructed in accordance with the adopted California Energy Code. Because of this, the project would be consistent with the energy efficiency strategies in the Climate Action Plan. The review concludes that project impacts related to consistency with energy plans would be *Less Than Significant.*

2.7 GEOLOGY AND SOILS

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			✓	
ii) Strong seismic ground shaking?			✓	
iii) Seismic-related ground failure, including liquefaction?			✓	

iv) Landslides?				✓
b) Result in substantial soil erosion or the loss of topsoil?			✓	
c) Be located on strata or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✓	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?			✓	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✓
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		

Environmental Impacts and Mitigation Measures

a-i) Fault Rupture.

The adopted IS/MND concluded that project impacts were Less Than Significant, as the project site is not within a designated Alquist-Priolo Earthquake Fault Zone. The adopted IS/MND adequately describes the potential fault rupture impacts of the project. This review concurs with the adopted IS/MND that project impacts related to fault rupture would be *Less Than Significant.*

a-ii) Seismic Ground Shaking.

The adopted IS/MND concluded that project impacts were Less Than Significant, as the project would comply with the provisions of the adopted Uniform Building Code, and liquefaction is considered a low to moderate hazard. The project must comply with the 2019 California Building Code adopted by the City of Stockton. The Building Code contains requirements that address likely ground shaking hazards that may occur in Stockton. It can require detailed soils and/or geotechnical studies in areas of suspected geological hazards, such as unstable geologic units that may be subject to collapse, subsidence, landslides, liquefaction, or lateral spreading. The City routinely requires the submittal of a geotechnical report and adherence to geotechnical recommendations as part of its building permit approval process. With consideration to this additional information, this review concurs with the adopted IS/MND that project impacts related to seismic ground shaking would be *Less Than Significant.*

a-iii) Other Seismic Hazards.

See a-ii) above. The adopted IS/MND concluded that project impacts were Less Than Significant, and this review concurs that project impacts related to other seismic hazards would be *Less Than Significant.*

a-iv) Landslides.

The adopted IS/MND concluded that project impacts were Less Than Significant due to the flat topography of the area. As the topography of the project site and vicinity is essentially flat, the project site remains unlikely to experience any landslides. Therefore, this review concludes that the project would have *No Impact* related to landslides.

b) Soil Erosion.

The adopted IS/MND concluded that project impacts were Less Than Significant, as potential soil erosion from construction activities would be minimized by compliance with the City's Grading Ordinance, and no erosion would occur after project completion. The adopted IS/MND did not note that the project would require a Construction General Permit from the SWRCB. As part of permit conditions, a Storm Water Pollution Prevention Plan (SWPPP) must be prepared by a Qualified SWPPP Developer. The SWPPP would include implementation of Best Management Practices (BMPs) to avoid or minimize adverse water quality impacts from erosion and sedimentation. BMPs fall within the categories of Temporary Soil Stabilization, Temporary Sediment Control, Wind Erosion Control, Tracking Control, Non-Storm Water Management, and Waste Management and Materials Pollution Control.

In addition, the City of Stockton has a Storm Water Management Plan (SWMP) that requires implementation of construction BMPs for erosion control, including limitations on disturbance and temporary soil stabilization through the use of mulch, seeding, soil stabilizers, and fiber rolls and blankets. However, noting this additional information, this review concurs with the adopted IS/MND that project impacts related to soil erosion would be *Less Than Significant.*

c) Unstable Soils.

The adopted IS/MND concluded that project impacts were Less Than Significant, as the project is not within an Earthquake Fault Zone and would comply with the City's adopted Uniform Building Code. With the additional information in a-ii) above, this review concurs with the adopted IS/MND that project impacts related to unstable soils would be *Less Than Significant.*

d) Expansive Soils.

The adopted IS/MND concluded that project impacts related to expansive soils were Less Than Significant. While the project site has a high potential of expansive soils, compliance with all City building standards and practices, as well as application of the existing regulations identified in the Uniform Building Code would minimize the impact. The adopted IS/MND adequately describes these impacts. The review concurs with the IS/MND that project impacts related to expansive soils would be *Less Than Significant.*

e) Adequacy of Soils for Wastewater Disposal.

The adopted IS/MND concluded that the project would have No Impact on this issue, as the project would connect to the City's sewer system and would not use its own wastewater system. The adopted IS/MND adequately describes impacts in this issue area. This review concurs with the adopted IS/MND that the project would have *No Impact* related to adequacy of soils for wastewater disposal.

f) Paleontological Resources.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated. No known paleontological resources or unique geologic features exist within the project area, but unknown resources could be encountered during construction. Mitigation in the adopted IS/MND would reduce impacts on discovered resources. The adopted IS/MND adequately describes paleontological impacts in its Cultural Resources section. Mitigation Measure CUL-2 in the adopted IS/MND would reduce impacts on paleontological resources that may be encountered. This mitigation measure remains applicable to the project. This review concurs with the adopted IS/MND that project impacts related to paleontological resources would be *Less Than Significant with Mitigation Incorporated.*

2.8 GREENHOUSE GAS EMISSIONS

Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		✓		
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

Environmental Setting

The adopted IS/MND analyzed greenhouse gas (GHG) emission impacts in its Air Quality section. Since adoption of the IS/MND, the following actions have occurred:

- In 2014, the ARB approved the First Update to the Scoping Plan, adopted per AB 32. The 2014 Update lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to the 2050 target set forth in Executive Order S-3-05. It recommends actions in nine sectors: energy, transportation, agriculture, water, waste management, natural and working lands, short-lived climate pollutants, green buildings, and the cap-and-trade program (ARB 2014).

- Also in 2014, the City of Stockton adopted a Climate Action Plan (CAP). The CAP "outlines a framework to feasibly reduce community GHG emissions in a manner

that is supportive of AB 32." The CAP sets a GHG emission reduction target of 10% below 2005 GHG emission levels by 2020, or approximately 20.6% below 2020 "business as usual" GHG emissions (i.e., 2020 GHG emissions that are unmitigated), which is the level by which the State has set its emission reduction goal. Approximately 83% of the reductions needed to achieve the City's GHG reduction goal are achieved through state-level programs, and 17% are achieved through City-level programs. (City of Stockton 2014).

- In 2015, Governor Brown signed Executive Order B-30-15, which advanced the goals of Executive Order S-3-05 by establishing a GHG reduction target of 40% below 1990 emission levels by 2030.

- In 2016, the State enacted SB 32, which codified the goals in Executive Order B-30-15 of reducing GHG emissions to 40% below 1990 emission levels by 2030.

- In 2017, ARB adopted an updated Scoping Plan that sets forth strategies for achieving the SB 32 target. The updated Scoping Plan continues many of the programs that were part of the previous Scoping Plan, including the cap-and-trade program, low-carbon fuel standards, renewable energy, and methane reduction strategies. It also addresses for the first time GHG emissions from the natural and working lands of California, including the agriculture and forestry sectors (ARB 2017).

Information in the Stockton CAP provide significance thresholds that can be used to determine project impacts. Neither the City, San Joaquin County, nor SJVAPCD has established quantitative significance thresholds, although the SJVAPCD recommends a 29% reduction from business-as-usual GHG levels for project operational emissions. The Stockton CAP determined that approximately 83% of the GHG reductions targeted by the City would be accomplished by statewide measures, while 17% would be accomplished by local measures. Based on these percentages, local measures would contribute approximately 5% of the 29% GHG reduction recommendation by SJVAPCD. For the purposes of this analysis, a project that can attain at least a 5% reduction in GHG emissions from business-as-usual levels would have impacts on GHG reduction plans that would be less than significant.

Environmental Impacts and Mitigation Measures

a) Project GHG Emissions.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated. The project would generate GHG emissions but not at a level to have a significant cumulative effect, and mitigation described in the adopted IS/MND would implement GHG reduction measures.

GHG emissions are related to global climate change. As such, the impacts of a project's GHG emissions are considered cumulative in nature. The potential GHG impacts of planned urbanization in the City of Stockton were addressed in the Stockton General Plan

2040 EIR and were found to be significant. The General Plan 2040 EIR identified mitigation measures, including adoption of the CAP, and these measures were incorporated into the General Plan 2040 and are a part of the City's environmental review, permitting and fee structures. Nevertheless, even with the adopted mitigation measures, the cumulative impact of planned urbanization on GHG emissions would be significant and unavoidable. A Statement of Overriding Considerations was adopted for this impact in conjunction with the approval of the Stockton General Plan 2040.

Based on results from the recent CalEEMod run conducted for the project (see Appendix), maximum project construction GHG emissions for a calendar year for the proposed project would be approximately 2,492 metric tons CO_2e for an assumed construction period of approximately two years. Project operational GHG emissions, mainly from vehicle use, are estimated to generate approximately 12,745 metric tons CO2e annually without mitigation.

Construction emissions would occur only during construction work and would cease once work is completed. Implementation of rules described in the Air Quality section that are designed to reduce construction air pollutant emissions is also expected to reduce incrementally the amount of GHGs generated by project construction. Also, the ARB has implemented the Regulation for In-Use Off-Road Diesel Fueled Fleets, which applies to all self-propelled off-road diesel vehicles 25 horsepower or greater used in California and most two-engine vehicles (except on-road two-engine sweepers). Compliance with the Off-Road Regulation would lead to an incidental reduction in GHG emissions, though the amount of this reduction cannot be determined. Given the temporary nature of construction emissions, along with the rules and regulations that would be implemented, project GHG construction emissions would have an impact considered less than significant.

The CalEEMod run incorporated measures that mitigate GHG emissions based on the following conditions:

- The project would construct sidewalks that would become part of an existing sidewalk network in the vicinity.
- The project would implement an employee trip reduction program in accordance with SJVAPCD Rule 9410 (see Section 2.1.2).
- In accordance with SBX7-7, the project would implement water conservation measures that lead to a 20% reduction in indoor and outdoor water use.
- In accordance with AB 341, the project would divert 75% of its solid waste stream through recycling and other measures.

With incorporation of these measures, estimated operational GHG emissions would be reduced to approximately 10,536 metric tons CO_2e annually, an approximately 8.1% reduction in GHG emissions from unmitigated levels. As noted, a project that can show GHG reductions greater than 5% from the business-as-usual (unmitigated) level can be said to be consistent with the reduction goals of the Stockton CAP. Since the Stockton CAP goals are intended to be consistent with both the State's and SJVAPCD's plans, this reduction would be consistent with the goals of these plans.

As project emissions would not exceed GHG reduction targets, project development would not generate new or more severe GHG impacts that were not analyzed in the Stockton General Plan 2040 EIR. The adopted IS/MND identified Mitigation Measure AIR-4, which is designed to reduce GHG emissions associated with the project. Since the CalEEMod run indicates that emissions of these pollutants would not exceed applicable significance thresholds, this mitigation measure does not seem necessary. Nevertheless, as the IS/MND was adopted with this mitigation measure, the project applicant is required to implement it, resulting in further reductions of GHG emissions. Because of this, the project would not make a contribution to GHG impacts that is cumulatively considerable. Given this, this review concurs with the adopted IS/MND that project impacts related to air quality plan consistency would be *Less Than Significant with Mitigation Incorporated.*

b) Consistency with GHG Reduction Plans.

Per SB 32, the State has set a 2030 reduction target of 40% below 1990 GHG emission levels. Based on information in the CAP, the 2030 percentage reduction from business-as-usual levels that would be required in 2030 would be approximately 64.5%. Based on estimates in the 2017 Scoping Plan, State actions would account for 89.8% of GHG reductions needed by 2030, with local actions accounting for approximately 9.3% of reductions. Applying this ratio to the percentage reduction for 2030, then approximately 6.0% of the reduction from 2030 business-as-usual levels would be achieved by local measures. A project that can shows GHG reductions greater than 6.0% can be said to be consistent with the reduction goals of SB 32. Mitigated project GHG operational emissions would exceed this percentage. Therefore, the project would be consistent with the reduction goals of SB 32.

Based on the analysis presented in this section, the project would be consistent with the reduction goals of the City's CAP, AB 32, and SB 32. Project impacts related to GHG reduction plans would be *Less Than Significant*.

2.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✓	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			✓	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government				✓

Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?		✓		
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			✓	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			✓	

Environmental Impacts and Mitigation Measures

a) Hazardous Materials Transportation, Use, and Disposal.

The adopted IS/MND concluded that project impacts were Less Than Significant, as the transport, use, and disposal of hazardous materials would be subject to various federal, State, and local regulations that would minimize impacts. The adopted IS/MND adequately describes these potential impacts. This review concurs with the adopted IS/MND that project impacts related to hazardous materials transportation, use and disposal would be *Less Than Significant.*

b) Release of Hazardous Materials by Upset or Accident.

The adopted IS/MND concluded that project impacts were Less Than Significant, as the transport, use and disposal of hazardous materials would be subject to various federal, State, and local regulations that would minimize impacts and notes that a Phase I Environmental Site Assessment prepared for the project site did not identify any recognized environmental conditions. The adopted IS/MND adequately describes these potential impacts. This review concurs with the adopted IS/MND that project impacts related to release of hazardous materials would be *Less Than Significant.*

c) Release of Hazardous Materials near Schools.

The adopted IS/MND concluded that project impacts were Less Than Significant, as the project site is not located within one-quarter mile of a school. The adopted IS/MND adequately describes impacts in this issue area. This review concurs with the adopted IS/MND that project impacts related to release of hazardous materials near schools would be *Less Than Significant.*

d) Hazardous Materials Sites.

The adopted IS/MND concluded that the project would have No Impact on this issue. The adopted IS/MND adequately describes potential for impacts in this issue and notes that a Phase I Environmental Site Assessment prepared for the project site did not identify any

recognized environmental conditions. This review concurs with the adopted IS/MND that the project would have *No Impact* related to hazardous material sites.

e) Airport Hazards.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated. While the project is within the horizontal surface boundary of the Stockton Metropolitan Airport, proposed development would not present a hazard to airport operations with the application of mitigation. Mitigation Measures LU-1a and LU-1b, in the Land Use section of the adopted IS/MND, would reduce impacts related to airport hazards. The IS/MND adequately describes potential airport hazard impacts, and these mitigation measures remain applicable to the project. This review concurs with the adopted IS/MND that project impacts related to airport hazards would be *Less Than Significant with Mitigation Incorporated.* It should be noted that the adopted IS/MND analyzed impacts related to private airstrip hazards, an issue which was deleted from the CEQA Environmental Checklist after the IS/MND had been adopted. No impacts were identified with private airstrip hazards.

f) Emergency Response and Evacuation.

The adopted IS/MND concluded that project impacts were Less Than Significant, as the applicant will be required to demonstrate compliance with all emergency access requirements and other emergency standards in place in the City. The IS/MND adequately describes impacts in this issue area, and this review concurs with the adopted IS/MND that project impacts related to emergency response and evacuation would be *Less Than Significant.*

g) Wildland Fire Hazards.

The adopted IS/MND concluded that project impacts were Less Than Significant, as the California Department of Forestry and Fire Protection characterizes the project site as containing little or no threat to a moderate threat of wildland fires. The adopted IS/MND adequately describes these potential impacts. This review concurs with the adopted IS/MND that project impacts related to wildland fire hazard would be *Less Than Significant.* Section 2.20, Wildfire, expands on the analysis of impacts related to wildfires.

2.10 HYDROLOGY AND WATER QUALITY

Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		✓		
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project			✓	

may impede sustainable groundwater management of the basin?				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site?		✓		
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?		✓		
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?		✓		
iv) Impede or redirect flood flows?			✓	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			✓	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			✓	

Environmental Impacts and Mitigation Measures

a) Violation of Water Quality Standards.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated. While project construction could produce contaminated stormwater runoff, mitigation would reduce this impact. Mitigation Measure HYDRO-1 in the adopted IS/MND, which focuses on potential contaminants from construction activities, would reduce potential water quality impacts to a level that would be less than significant. The adopted IS/MND adequately describes the potential impacts of the project in this issue area, and this mitigation measure remains applicable to the project. This review concurs with the adopted IS/MND that project impacts related to water quality standards would be *Less Than Significant with Mitigation Incorporated.*

b) Groundwater Supplies and Recharge.

The adopted IS/MND concluded that project impacts on groundwater were Less Than Significant, as the project would not directly use groundwater, and the City is expected to rely less on groundwater for the supplies it would provide to the project. In addition, reduction in recharge area would be minimized by the project's storm drainage system. The adopted IS/MND adequately describes these impacts, and this review concurs with the adopted IS/MND that project impacts related to groundwater would be *Less Than Significant.*

c-i, -ii) Drainage Patterns – Erosion, Siltation, and Flooding.

The adopted IS/MND concluded that project impacts on drainage patterns were Less Than Significant with Mitigation Incorporated, as the project proposes to install a storm drainage system. Mitigation Measure HYDRO-2 in the adopted IS/MND, which addresses the storm drainage system, would reduce impacts to a level that would be less than significant. The adopted IS/MND adequately describes these impacts, and this mitigation measure remains applicable to the project. This review concurs with the adopted IS/MND that project impacts related to drainage patterns would be *Less Than Significant with Mitigation Incorporated.*

c-iii) Runoff.

The adopted IS/MND concluded that project impacts on runoff were Less Than Significant with Mitigation Incorporated. Mitigation Measure HYDRO-2 in the adopted IS/MND would reduce impacts to a level that would be less than significant (see c-ii above). The adopted IS/MND adequately describes these impacts, and this mitigation measure remains applicable to the project. This review concurs with the adopted IS/MND that project impacts related to runoff would be *Less Than Significant with Mitigation Incorporated.*

c-iv) Flood Flows.

The adopted IS/MND concluded that project impacts were Less Than Significant. While most of the project site is outside the 100-year floodplain, the northwest portion is inside it. However, any structures constructed in this portion of the site are not anticipated to impede or redirect flood flows. The adopted IS/MND adequately describes potential flooding impacts.

In 2007, the State of California approved a series of related Senate and Assembly bills, referred to collectively as SB 5, that establishes the State standard for flood protection in urban areas in the Central Valley as protection from the 200-year flood. This protection must be provided no later than 2025. After July 2, 2016, new development in areas potentially exposed to 200-year flooding more than three feet deep is prohibited unless the local land use agency certifies that 200-year flood protection has been provided, or that "adequate progress" has been made toward provision of 200-year flood protection by 2025. According to the adopted Stockton General Plan, the project site is not within a 200-year flood zone with which SB 5 is concerned. With this additional information, this review concurs with the adopted IS/MND that project impacts related to flood flows would be *Less Than Significant.*

d) Release of Pollutants in Flood Zone.

The adopted IS/MND did not analyze potential releases of pollutants associated with flooding, seiches, or tsunamis. The adopted IS/MND indicated that a portion of the project site is within a 100-year flood zone. However, the adopted IS/MND also stated that flood protection for the project site is provided by a large system of levees and upstream impoundments. Therefore, flooding would be unlikely to occur on the project site. The project site is not located near a body of water where seiches or tsunamis may occur. Based

on this information, project impacts related to the possible release of pollutants during inundation are considered *Less Than Significant*.

e) Conflict with Water Quality or Sustainable Groundwater Plans.

The adopted IS/MND did not specifically analyze conflicts with water quality or sustainable groundwater plans. The project would be required to comply with water quality provisions in the City's Storm Water Management Program and Storm Water Quality Control Criteria Plan, including post-construction BMPs. These provisions are designed to ensure the City complies with the conditions of its NPDES MS4 permit. In turn, compliance with the permit conditions would ensure consistency with the water quality objectives and standards of the Basin Plan.

Since adoption of the IS/MND, the State enacted the Sustainable Groundwater Management Act in 2014. This act requires the creation of local Groundwater Sustainability Agencies, each of which must prepare and adopt a Groundwater Sustainability Plan to ensure sustainable groundwater yields and prevent groundwater depletion in the agency's jurisdiction. In 2017, the City chose to join the Eastern San Joaquin Groundwater Joint Powers Authority, which adopted a Groundwater Sustainability Plan in November 2019. As noted in b) above, the project would not have a significant impact on groundwater supplies.

Based on this information, project impacts related to conflict with water quality or sustainable groundwater plans are considered *Less Than Significant*.

2.11 LAND USE AND PLANNING

Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?				✓
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?		✓		

Environmental Impacts and Mitigation Measures

a) Division of Established Communities.

The adopted IS/MND concluded that the project would have No Impact on this issue, as the project is within a largely undeveloped area used historically for agriculture. The adopted IS/MND adequately describes impacts. This review concurs with the adopted IS/MND that the project would have *No Impact* on division of established communities.

b) Conflict with Applicable Plans, Policies and Regulations Avoiding or Mitigating Environmental Effects.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated. Zoning would be made consistent with the Stockton General Plan designation for the project site. The project would comply with the applicable requirements of the Stockton Airport's Land Use Compatibility Plan and applicable FAA regulations with implementation of Mitigation Measures LU-1a and LU-1b.

The adopted IS/MND did not mention the City's Agricultural Land Mitigation Program for this issue, although it was mentioned in the IS/MND's Agricultural Resources section. This program would reduce impacts related to conversion of agricultural land.

Since adoption of the IS/MND, an updated Airport Land Use Compatibility Plan was adopted for Stockton Metropolitan Airport. The updated plan indicates that the project site is within Safety Zones 7a and 7b for the airport. Mitigation Measures LU-1a and LU-1b in the IS/MND would reduce potential conflicts with the Stockton Airport ALUCP to a level that would be less than significant. These mitigation measures remain applicable to the project.

Also, since adoption of the project IS/MND, the State has enacted legislation that seeks to address the adverse environmental impacts of projects that disproportionately affect minority and/or lower income communities, particularly those already burdened with environmental problems. The California Office of Environmental Health Hazard Assessment has developed the California Communities Environmental Health Screening Tool (CalEnviroScreen) to identify "environmental justice" or "disadvantaged" communities. CalEnviroScreen measures pollution and population characteristics using 20 indicators such as air and drinking water quality, waste sites, toxic emissions, asthma rates, and poverty. It applies a formula to each U.S. Census tract in California to generate a score that rates the level of cumulative impacts on each area. A census tract that scores in the top 25% is considered a disadvantaged community. According to CalEnviroScreen, the score for the census tract within which the project site is located is within the top 25%.

It is most likely that adverse project impacts on disadvantaged communities would be related to air quality. As described in Section 2.3, Air Quality, an HRA conducted for the project concluded that potential carcinogenic risks for nearby sensitive receptors, including a residence and the CDCR facilities, would not exceed the SJVAPCD significance threshold for such risk. As such, this review concurs with the adopted IS/MND that project impacts regarding conflicts with applicable plans, policies and regulations that would avoid or mitigate environmental effects would be *Less Than Significant with Mitigation Incorporated*.

2.12 MINERAL RESOURCES

Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✓

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✓

Environmental Impacts and Mitigation Measures

a, b) Loss of Availability of Mineral Resources.

The adopted IS/MND concluded that the project would have No Impact on this issue, as no mineral resource deposits were identified on the project site. The adopted IS/MND adequately describes impacts. This review concurs with the adopted IS/MND that the project would have *No Impact* related to mineral resources.

2.13 NOISE

Would the project result in:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		✓		
b) Generation of excessive groundborne vibration or groundborne noise levels?		✓		
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			✓	

Environmental Impacts and Mitigation Measures

a) Exposure to Noise Exceeding Local Standards.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated. Noise from construction activities and project operations could exceed noise standards applicable to nearby land uses sensitive to noise. Mitigation Measures NOISE-1 through NOISE-5 in the IS/MND would reduce project noise impacts to a level that would be less than significant. It should be noted that, due to changes in the project setting and design, Mitigation Measures NOISE-4 and NOISE-5 are no longer applicable. The adopted IS/MND adequately describes impacts, both from construction and from project operations, and these mitigation measures remain applicable to the project. This review concurs with the adopted IS/MND that project impacts related to noise exposure would be *Less Than Significant with Mitigation Incorporated.*

b) Groundborne Vibration.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated. Construction equipment may generate groundborne vibrations that could affect nearby sensitive land uses. Mitigation Measures NOISE-1 and NOISE-2 in the IS/MND would reduce vibration impacts to a level that would be less than significant. The adopted IS/MND adequately describes impacts, both from construction and from project operations, and these mitigation measures remain applicable to the project. This review concurs with the adopted IS/MND that project impacts related to groundborne vibration would be *Less Than Significant with Mitigation Incorporated.*

c) Exposure to Airport/Airstrip Noise.

The adopted IS/MND concluded that project impacts were Less Than Significant, as the proposed development would not be sensitive to noise from airport operations, and no private airstrips are in the vicinity. The adopted IS/MND adequately describes impacts. This review concurs with the adopted IS/MND that project impacts related to airport/airstrip noise would be *Less Than Significant.*

2.14 POPULATION AND HOUSING

Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			✓	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✓

Environmental Impacts and Mitigation Measures

a) Unplanned Population Growth.

The adopted IS/MND concluded that project impacts were Less Than Significant, as the project does not propose the construction of homes. The adopted IS/MND analyzed the potential of the project to induce population growth, either directly or indirectly, and determined the project would have No Impact. After adoption of the IS/MND, this portion of the CEQA Environmental Checklist was revised to address unplanned population growth, rather than the inducement of population growth. Project development would be consistent with the Industrial designation for the project site under the Stockton General Plan. As such, any population growth associated with the project would be consistent with the projections of future population growth in the Stockton General Plan Planning Area, which are based in part on designated land uses. With this additional information, this review concurs that project impacts related to population growth would be *Less Than Significant.*

b) Displacement of Housing and People.

The adopted IS/MND concluded that the project would have No Impact on this issue, as homes would not be displaced as a result of the project. The adopted IS/MND adequately describes impacts. This review concurs with the adopted IS/MND that the project would have *No Impact* on displacement of housing or people.

2.15 PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
i) Fire protection?			✓	
ii) Police protection?			✓	
iii) Schools?				✓
iv) Parks?				✓
v) Other public facilities?				✓

Environmental Impacts and Mitigation Measures

a-i) Fire Protection.

The adopted IS/MND concluded that project impacts on public services were Less Than Significant, as Public Facility Fees for fire protection would be paid by the project to the City. Upon annexation, the project would be served by the Stockton Fire Department. For other projects in the area, concern has been expressed about the current response time for emergency calls from the nearest Stockton Fire Department station – approximately 10-12 minutes. Response times are not considered an impact requiring mitigation under CEQA, as decided in *City of Hayward v. Board of Trustees* (2015). Therefore, this review concurs with the IS/MND that project impacts related to fire protection services would be *Less Than Significant.* However, it should be noted that the project applicant, the San Joaquin LAFCo, and the fire protection agencies are discussing an interagency agreement that would provide interim fire protection service as well as other options for improving fire protection services to the project area until Stockton Fire Department response times can be reduced.

a-ii) Police Protection.

The adopted IS/MND concluded that police protection impacts of the project were Less Than Significant, as Public Facility Fees for police protection would be paid by the project

to the City. The adopted IS/MND adequately describes impacts. This review concurs with the adopted IS/MND that project impacts related to police protection services would be *Less Than Significant.*

a-iii) Schools.

The adopted IS/MND concluded that the project would have No Impact on schools, as the project would generate no school demand but would still pay impact fees for schools to the Stockton Unified School District. The adopted IS/MND adequately describes impacts. This review concurs with the adopted IS/MND that the project would have *No Impact* on schools. However, it should be noted that the project would be responsible for the payment of development impact fees to the Stockton Unified School District to assist in funding future school facilities when required.

a-iv) Parks.

The adopted IS/MND concluded that the project would have No Impact on parks, as the project would not generate an additional demand for park services. The adopted IS/MND adequately describes potential park impacts. This review concurs with the adopted IS/MND that the project would have *No Impact* on parks. Parks issues were discussed in more detail in the Recreation section of the IS/MND.

a-v) Other Public Facilities.

While the adopted IS/MND concluded the project would have No Impact, it did not have a detailed discussion of impacts on other public facilities, which would include libraries, courthouses, and medical facilities. However, since the project would not generate any unplanned population growth, it would not place additional demands upon these other public services. Based on this, this review concurs with the adopted IS/MND that the project would have *No Impact* on other public facilities.

2.16 RECREATION

	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				✓
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✓

Environmental Impacts and Mitigation Measures

a) Increased Use of Recreational Facilities.

The adopted IS/MND concluded that the project would have No Impact on existing recreational facilities, as the project would not lead to an increased use of recreational facilities. The adopted IS/MND adequately describes impacts. This review concurs with the adopted IS/MND that the project would have *No Impact* related to increased use of recreational facilities.

b) New or Expanded Recreational Facilities.

The adopted IS/MND concluded that the project would have No Impact on the need for new or expanded recreational facilities, as the project would not generate additional demand for parks or recreational facilities. The adopted IS/MND adequately describes impacts. This review concurs with the adopted IS/MND that the project would have *No Impact* on parks or recreational facilities.

2.17 TRANSPORTATION

Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?		✓		
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			✓	
c) Substantially increase hazards to a geometric design feature (e g., sharp curves or dangerous intersections) or incompatible uses (e g, farm equipment)?		✓		
d) Result in inadequate emergency access?			✓	

Environmental Impacts and Mitigation Measures

a) Conflict with Transportation Plans, Ordinances, and Policies.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated. The project would affect traffic flow at the Arch Road/Newcastle Road intersection and at the ramps at the SR 99/Arch Road interchange. Additionally, future traffic flow may be affected at the Arch Road/Frontier Way intersection. Mitigation Measures TRAF-1, TRAF-2, and TRAF-3a and 3b in the adopted IS/MND would reduce impacts to a level that would be less than significant. It should be noted that, due to changes in project design, Mitigation Measure TRAF-3a is no longer applicable.

Since adoption of the IS/MND, the questions in this section of the CEQA Environmental Checklist have been modified. Despite these modifications, the adopted IS/MND adequately describes impacts related to conflicts with transportation plans and programs. The mitigation measures in the IS/MND remain applicable to the project. This review

concurs with the adopted IS/MND that project impacts related to traffic would be *Less Than Significant with Mitigation Incorporated.*

b) Conflict with CEQA Guidelines Section 15064.3(b).

Since adoption of the project IS/MND, the CEQA Environmental Checklist has been revised to include this question on CEQA Guidelines Section 15064.3(b). The State of California has recently added Section 15064.3 to the CEQA Guidelines, which is meant to incorporate SB 743 into CEQA analysis. SB 743 was enacted in 2013 with the intent to balance congestion management needs and the mitigation of the environmental impacts of traffic with statewide GHG emission reduction goals. SB 743 directed the Governor's Office of Planning and Research to develop an alternative mechanism for evaluating transportation impacts and to amend the CEQA guidelines to provide a transportation impact analysis framework that prioritizes reducing GHG emissions, replacing the focus on minimizing automobile delay.

Section 15064.3 states that vehicle miles traveled (VMT) is the preferred method for evaluating transportation impacts, rather than the commonly used LOS. The VMT metric measures the total miles traveled by vehicles as a result of a given project by multiplying the number of vehicle trips by the length of vehicle trips. Unlike LOS, VMT accounts for the total environmental impact of transportation associated with a project, including use of non-vehicle travel modes. Section 15064.3(b) sets forth the criteria for analyzing transportation impacts using the preferred VMT metric:

- VMT exceeding an applicable threshold of significance may indicate a significant impact.
- Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing "high-quality transit corridor" should be presumed to cause a less-than-significant transportation impact.
- Projects that decrease VMT in the project area compared to existing conditions should be presumed to cause a less-than-significant transportation impact.

To date, the City has not formally adopted any VMT thresholds, including the baseline VMT per capita. However, Stockton General Plan Action TR-4.3A states that the City shall establish a threshold of 15% below baseline VMT per capita to determine a significant transportation impact under CEQA. The 15% threshold in General Plan Action TR-4.3A is similar to thresholds for residential and office land use types recommended by the Office of Planning and Research in its *Technical Advisory on Evaluating Transportation Impacts in CEQA* (2019) and is used in the traffic study to determine the significance of VMT impacts associated with the project.

Residential, office, and retail projects tend to have the greatest influence on VMT (OPR 2019). The *Technical Advisory* does not recommend a specific threshold for VMT impacts by warehouse projects, and the City to date has not formally adopted such a threshold. The proposed development would be consistent with the Industrial designation of the Stockton 2040 General Plan. The Stockton 2040 General Plan EIR estimated VMT for the Planning

Area. As the proposed land use would be consistent with the General Plan, it is not expected to lead to an increase in VMT for the Planning Area. Therefore, the review concludes that project impacts related to VMT would be *Less Than Significant.*

c) Traffic Hazards.

The adopted IS/MND concluded that project impacts related to traffic hazards were Less Than Significant with Mitigation Incorporated. Potential traffic safety issues were identified at the Arch Road/Frontier Way intersection and at the driveway accessing the project site. Mitigation Measure TRAF-3b in the adopted IS/MND would reduce impacts to a level that would be less than significant. The adopted IS/MND adequately describes impacts under this issue, and these mitigation measures remain applicable to the project. The review concurs with the IS/MND that project impacts related to noise exposure would be *Less Than Significant with Mitigation Incorporated.*

d) Emergency Access.

The adopted IS/MND concluded that project impacts related to emergency access were Less Than Significant, as adequate access to the project site for emergency vehicles would be provided. The adopted IS/MND adequately describes impacts under this issue. This review concurs with the adopted IS/MND that project impacts related to emergency access would be *Less Than Significant.*

2.18 TRIBAL CULTURAL RESOURCES

	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or		✓		
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision I of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?		✓		

Since adoption of the IS/MND, the CEQA Environmental Checklist has been updated to include questions specifically addressing tribal cultural resources, arising from the passage of AB 52 in 2014. AB 52 requires CEQA consultation with Native American tribes on

projects that could potentially affect resources of value to the tribes. Consultation with tribes on a notice list shall be initiated prior to the release of the CEQA document for public review.

When a tribe requests consultation, the lead agency must provide the tribe with notice of a proposed project within 14 days either of a project application being deemed complete or when the lead agency decides to undertake the project if it is the agency's own project. The tribe has 30 days from receipt of the notification letter to respond in writing. If the tribe requests consultation, then the lead agency has up to 30 days after receiving the tribe's request to initiate formal consultation. Matters which may be subjects of AB 52 consultation include the type of CEQA environmental review necessary, the significance of tribal cultural resources, and project alternatives or appropriate measures for preservation or mitigation of the tribal cultural resource that the tribe may recommend to the lead agency.

AB 52 took effect on July 1, 2015. Projects with a Notice of Preparation or a Notice of Intent filed on or after July 1, 2015 are subject to AB 52 procedures, while projects filing prior to that date are not required to consult under AB 52. Since the Notice of Intent for the IS/MND was filed prior to July 1, 2015, no AB 52 consultation is required for this project.

Environmental Impacts and Mitigation Measures

a-i, -ii) Tribal Cultural Resources.

The adopted IS/MND concluded that project impacts on archaeological resources and human burial, which included Native American resources, were Less Than Significant with Mitigation Incorporated. The adopted IS/MND adequately describes potential impacts on tribal cultural resources in the Cultural Resources section. It was noted in the adopted IS/MND that a search by the Native American Heritage Commission of its Sacred Lands File failed to indicate the presence of Native American cultural resources in the area. Also, it was noted that the Northern Valley Yokuts tribe was contacted, and the tribe requested the presence of an archaeological monitor as well as a Native American monitor during earth moving activities. This request was incorporated in Mitigation Measure CULT-1 of the adopted IS/MND. Along with Mitigation Measures CULT-2 and CULT-3, this measure would reduce impacts on tribal cultural resources to a level that would be less than significant. These mitigation measures remain applicable to the project. With this additional information, project impacts on tribal cultural resources would be *Less Than Significant with Mitigation Incorporated.*

2.19 UTILITIES AND SERVICE SYSTEMS

Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications			✓	

facilities, the construction or relocation of which could cause significant environmental effects?				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			✓	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✓	
e) Comply with federal, state and local management and reduction statutes and regulations related to solid waste?				✓

Environmental Impacts and Mitigation Measures

a) Construction or Relocation of Infrastructure.

The project IS/MND discussed potential impacts related to water, wastewater, and storm drainage facilities and concluded that impacts would be Less Than Significant, as existing facilities are in the area. Since adoption of the IS/MND, the questions in this section of the CEQA Environmental Checklist have been modified. Despite these modifications, the IS/MND adequately describes impacts under this issue. This review concurs with the IS/MND that project impacts related to construction or relocation of infrastructure would be *Less Than Significant.*

b) Water Supply.

The adopted IS/MND concluded that project impacts related to water supply were Less Than Significant, as adequate water supply from the City was determined to exist for the project. The adopted IS/MND adequately describes impacts. This review concurs with the adopted IS/MND that project impacts on water supply would be *Less Than Significant.*

c) Wastewater Treatment Capacity.

The adopted IS/MND concluded that project impacts on wastewater treatment capacity were Less Than Significant, as the City's wastewater treatment plant was determined to have adequate capacity for the project. The adopted IS/MND adequately describes impacts in this issue area. This review concurs with the adopted IS/MND that project impacts on wastewater treatment capacity would be *Less Than Significant.*

d) Solid Waste Capacity.

The adopted IS/MND concluded that solid waste impacts were Less Than Significant, as there was determined to be no shortage of landfill capacity for solid waste that would be generated by the project. The adopted IS/MND adequately describes impacts in this issue

area. This review concurs with the adopted IS/MND that project impacts on solid waste capacity would be *Less Than Significant.*

e) Compliance with Solid Waste Statutes and Regulations.

The adopted IS/MND concluded that the project would have No Impact on this issue, as the project would comply with all applicable solid waste statutes and regulations. The adopted IS/MND adequately describes impacts. This review concurs with the adopted IS/MND that the project would have *No Impact* on compliance with solid waste statutes and regulations.

2.20 WILDFIRE

If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			✓	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			✓	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			✓	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			✓	

Environmental Setting

Since adoption of the IS/MND, the CEQA Environmental Checklist has included a section on wildfires. Wildland fires are an annual hazard in San Joaquin County. Wildland fires burn natural vegetation on undeveloped lands and include rangeland, brush, and grass fires. Long, hot, and dry summers with temperatures often exceeding 100°F add to the County's fire hazard. Human activities are the major causes of wildland fires, while lightning causes the remaining wildland fires. High hazard areas for wildland fires are the grass-covered areas in the east and the southwest foothills of the County (San Joaquin County 2016).

The California Department of Forestry and Fire Protection's Fire and Resource Assessment Program identifies fire threat based on a combination of two factors: 1) fire frequency, or the likelihood of a given area burning, and 2) potential fire behavior (hazard). These two factors are combined in determining the following Fire Hazard Severity Zones: Moderate, High, Very High, Extreme. These zones apply to areas designated as State Responsibility Areas – areas in which the State has primary firefighting responsibility. The project site is

not within a State Responsibility Area and therefore has not been placed in a Fire Hazard Severity Zone. The area surrounding the project site is likewise not in any designated fire hazard zone (Cal Fire 2007).

Environmental Impacts and Mitigation Measures

a) Emergency Response and Emergency Evacuation Plans.

As noted in Section 2.9, Hazards, and Section 2.17, Transportation, the project would not interfere with movement of emergency response vehicles or evacuations. There would be no new or more severe impacts associated with the proposed project. Project impacts on emergency response and evacuations would be *Less Than Significant.*

b) Exposure of Project Occupants to Pollutants.

The project site is within a developed area that is not in a Fire Hazard Severity Zone. It is not part of a State Responsibility Area (Cal Fire 2007). As noted in the IS/MND, the project site is located in a portion of the Sphere of Influence of the City of Stockton that is somewhat urbanized. The surrounding land primarily has little or no threat of wildland fires occurring, likely due to the cultivated agricultural land and the developed uses surrounding the project site. Project impacts related to exposure of occupants to pollutants would be *Less Than Significant*.

c) Installation and Maintenance of Infrastructure.

As noted in b) above, the project would be developed in a mostly urbanized area, and therefore is not expected to exacerbate fire risk in the area. Proposed project impacts would be *Less Than Significant*.

d) Risks from Runoff, Post-Fire Slope Instability, or Drainage Changes.

The project site is not located near foothills, and no streams from the foothill region traverse the project site. The project site is not in an area that would be vulnerable to runoff, post-fire slope instability, or drainage changes. Based on this, project impacts would be *Less Than Significant*.

2.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important		✓		

examples of the major periods of California history or prehistory?				
b) Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		✓		
c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?			✓	

a) Findings on Biological and Cultural Resources.

The adopted IS/MND concluded that project impacts in this issue area were Less Than Significant, as the project did not have the potential to substantially degrade the environment. Project impacts related to biological resources and cultural resources were evaluated in Sections 2.4 and 2.5, respectively. For both biological and cultural resources, potentially significant impacts were identified that could be mitigated to a level that would be less than significant through mitigation measures, or through compliance with the SJMSCP for biological resource impacts. Based on this, project impacts are therefore considered *Less Than Significant with Mitigation Incorporated.*

b) Findings on Cumulatively Considerable Impacts.

The adopted IS/MND concluded that project impacts were Less Than Significant with Mitigation Incorporated. The adopted IS/MND determined that the project would contribute to a cumulative traffic impact. With the implementation of mitigation measures TRAF-1, TRAF-2, and either TRAF-3a or TRAF-3b, this impact would be less than significant. The adopted IS/MND also identified cumulative impacts related to air quality and GHGs. However, based on an evaluation of air quality and GHG impacts described in Sections 2.3 and 2.8, the project was determined to not have a significant cumulative effect.

Since adoption of the 2011 IS/MND, there are several other industrial projects in the general vicinity of the Archtown project that have been approved and are under construction, have been approved and are expected to be under construction in the near future, or have been proposed and are considered likely to be approved. These include the Norcal Logistics Center project, the Sanchez-Hoggan project, and the Mariposa Industrial Park project (not yet approved). The environmental impacts of these projects, in addition to the impacts of the proposed project, might be cumulatively considerable even if impacts at the individual project level are less than significant.

The potential cumulative impacts of long-range urban development in the City of Stockton through the year 2040 are analyzed in the Stockton General Plan 2040 EIR (City of Stockton 2018b). The General Plan 2040 EIR considered the environmental effects of buildout of all lands designated in the Stockton General Plan for urban development, including development of the project site and other undeveloped lands in southeastern Stockton. Cumulative impacts related to General Plan development were not considered to

be considerable for all issue areas except for ozone precursor and GHG emissions. As noted, cumulative impacts of the project related to these emissions were not considered to be considerable. Development under the proposed project would be consistent with the designations in the Stockton General Plan; therefore, project impacts would be consistent with the cumulative impact findings in the General Plan 2040 EIR.

Moreover, as noted in Section 3.3, Air Quality, the Sanchez-Hoggan project east of the project site was recently approved. This project estimated that traffic activity, a significant contributor to air pollution, would be less than what was estimated for the project site under Stockton General Plan 2040 designations. Specifically, the VMT per capita associated with the Sanchez-Hoggan project would be 6 to 21% less than the VMT per capita estimated for Stockton General Plan development. With the reduced traffic activity from the Sanchez-Hoggan project, cumulative traffic in Stockton would be less than estimated by the Stockton General Plan 2040 EIR, as well as cumulative air pollutant emissions.

An analysis of the potential cumulative impacts of the proposed project with the other projects indicated that the project would not have a cumulatively considerable effect on most environmental issues. Issues on which the project may have a potentially significant cumulative effect included:

Agricultural Resources: An estimated 562 acres of Farmland as defined by CEQA Guidelines Appendix G would be converted to non-agricultural use. The impacts of agricultural land conversion in conjunction with urban development was identified in the Stockton General Plan EIR as a significant and unavoidable adverse effect. Based upon the criteria set by CEQA Guidelines Section 15152(d), the project would not involve a considerable contribution to cumulative agricultural resource impacts. However, all projects would be subject to the City of Stockton's Agricultural Land Mitigation Program, which would partially compensate for agricultural land conversion.

Air Quality: Potential cumulative impacts were discussed in Section 3.3 b). Since the current CalEEMod results also indicate that project operations would not exceed ROG, NOx, and particulate matter significance thresholds, the project would not have a potentially significant cumulative impact on ozone or particulate matter levels in the San Joaquin Valley Air Basin, which is in nonattainment status for both.

Biological Resources: Biological resource impacts, especially impacts on streams, were analyzed in the CEQA reviews for all projects and were found to be less than significant with mitigation incorporated. With implementation of these mitigation measures, including participation in the SJMSCP, cumulative impacts on biological resources were not considered significant.

Greenhouse Gas Emissions: GHG emissions are related to global climate change; thus, while a project may generate individual GHG emissions, the impacts of such emissions are global. As such, the impacts of a project's GHG emissions are considered cumulative in nature. The potential GHG impacts of planned urbanization in the City of Stockton were addressed in the Stockton General Plan 2040 EIR and were found to be significant and unavoidable even with mitigation. Based upon the criteria set by CEQA Guidelines Section 15152(d), the project would not involve a considerable contribution to cumulative

agricultural resource impacts. However, with incorporation of project features and compliance with SJVAPCD rules and regulations, the proposed project would be consistent with the GHG reduction objectives of the City's Climate Action Plan.

Hydrology and Water Quality: Project hydrological impacts can contribute to cumulative impacts in a watershed for surface waters, or a groundwater basin for groundwater. The hydrology and water quality impacts of planned urbanization under the Stockton General Plan 2040 were analyzed in the Stockton General Plan 2040 EIR. The EIR identified one potentially significant impact – existing and planned storm drainage infrastructure could be undersized or otherwise inadequate, leading to potential flooding and polluted runoff. The project would include a standalone drainage system, which would collect site runoff and discharge it to adjacent Weber Slough if and when capacity is available to accept. The project would not contribute substantially to citywide storm drainage concerns.

The proposed project, along with other development projects in the area, would involve no potential groundwater effects that are not already accounted for in existing demand projections and analyses, such as in the City of Stockton's Urban Water Management Plan. The development projects in the vicinity would obtain their potable water from the City's water system, which derives 75% of its supply from surface water sources. As a result, the project would not involve a considerable contribution to any significant cumulative groundwater supply or water quality effects.

Noise: The potential noise impacts of planned urbanization in the City of Stockton were addressed in the Stockton General Plan 2040 EIR and were found to be significant. However, the significant impacts were related to noise from traffic along identified road segments. Traffic noise levels associated with the project were evaluated in the IS/MND. It was determined that, under Cumulative Plus Project conditions, project traffic noise impacts would be less than significant with implementation of mitigation measures. Mitigation measures were identified for all projects to reduce noise from construction activities, and the Archtown and Norcal Logistics Center project have mitigation for HVAC units. The cumulative impacts of the project related to noise are not significant.

Transportation: The traffic analysis in the IS/MND was conducted prior to the approval or anticipated application of the other projects. Therefore, additional evaluation based on the Stockton General Plan 2040 EIR and individual project CEQA documents is required.

The potential transportation impacts of planned urbanization in the City of Stockton were addressed in the Stockton General Plan 2040 EIR and were found to be significant and unavoidable even with mitigation. The Sanchez-Hoggan EIR considered the potential for cumulatively considerable contributions to traffic impacts based on future development that is consistent with the Stockton General Plan 2040 and roadway improvements consistent with the long-term future context. This includes development of the project site consistent with what is proposed by the Archtown project. Under Cumulative Plus Project conditions, four roadway segments were determined to operate at unacceptable LOS. However, LOS at these segments would also be unacceptable under Cumulative No Project conditions, and the project-related increase in volume would not be greater than five percent. Therefore, based on criteria in the City of Stockton Transportation Impact

Analysis Guidelines, these impacts are considered less than significant, and no mitigation is required.

The Sanchez-Hoggan EIR also discussed impacts related to VMT under Cumulative Plus Project conditions. The analysis defined VMT impacts on a per capita/service population basis based on Stockton General Plan EIR data and a 15% VMT reduction threshold established by the Office of Planning and Research. With the application of mitigation, the VMT per capita under Cumulative Plus Project conditions would be 15% below the 2040 baseline VMT for the City as a whole and just under the 21% reduction in the 2040 VMT expected from urban development under the General Plan. It is expected that the proposed project would have cumulative LOS impacts and VMT impacts that are little different than those identified with the Sanchez-Hoggan project. The project would not make a considerable contribution to cumulative traffic impacts.

In summary, the project is not anticipated to have impacts that would be cumulatively considerable. This review concurs with the adopted IS/MND that cumulative project impacts would be *Less Than Significant with Mitigation Incorporated.*

c) Findings on Adverse Effects on Human Beings.

The adopted IS/MND concluded that project impacts were Less Than Significant, as effects related to hazardous materials, air quality, and noise were determined to be less than significant. The adopted IS/MND adequately describes impacts, other than DPM impacts on a nearby residence and CDCR facilities. As discussed in Section 2.3, Air Quality, an HRA conducted for the project indicated potential carcinogenic impacts of DPM emissions on these receptors would not be significant. With this information, this review concurs with the adopted IS/MND that project impacts would be *Less Than Significant.*

APPENDIX TO BASECAMP CEQA ADEQUACY ANALYSIS

AIR QUALITY/ GREENHOUSE GAS REPORT

AIR QUALITY/GREENHOUSE GAS REPORT

FOR THE

ARCHTOWN INDUSTRIAL PROJECT

Stockton, CA

Updated, September 29, 2020

Prepared for:

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1.0 INTRODUCTION

1.1 Report Summary

BaseCamp Environmental, Inc. was requested to provide an analysis of the air quality and greenhouse gas (GHG) emission impacts of the proposed Archtown Industrial Project (project). The proposed project is the annexation of four parcels into the City of Stockton (City) and the subsequent development of these parcels for light industrial and warehouse uses. The project location map and tentative map are shown in Figures 1-1 and 1-2, respectively.

This analysis was conducted using the CalEEMod computer model and comparing model results with impact significance thresholds established by the San Joaquin Valley Air Pollution Control District (SJVAPCD) and the State CEQA Guidelines. The results of the analysis indicated that the project would have no significant impacts on air quality, based upon SJVAPCD significance thresholds. It also would have no significant impact relative to greenhouse gas emissions and their impacts on global climate change, based upon SJVAPCD and City criteria, with the incorporation of mitigation measures as part of the project. However, the project could have a potentially significant impact related to exposure of an adjacent residence to project emissions of diesel particulate matter (DPM), which could elevate cancer risk for residents.

1.2 Project Description

The Archtown Industrial Project proposes the annexation of four parcels, totaling approximately 79 acres, into the City of Stockton (Figures 1-1 and 1-2). The proposed annexation area is located at the southwestern corner of the intersection of Arch Road and Newcastle Road, adjacent to and south of the Stockton city limits. The parcels consist of Assessor's Parcel Numbers (APNs) 181-110-02, 181-110-04, 181-110-06, and 181-110-07, along with 640 linear feet of adjacent Newcastle Road.

The project site is currently within the jurisdiction of San Joaquin County, with a County General Plan designation of General Agriculture and a zoning designation is AG-40 (General Agriculture; 40-acre minimum parcel size). However, the project site is designated as Industrial in the City of Stockton General Plan, as is much of the surrounding area. As part of the annexation, the City proposes to pre-zone the project site as IL – Industrial, Limited. The IL pre-zoning would allow for the proposed development of approximately 1.2 million square feet of light industrial and warehouse land uses. The project site would be subdivided into nine buildable lots and then sold to future owners (Figure 1-3). A road would be extended from Newcastle Road onto the project site to provide access to the lots.

The project would include frontage improvements and utility (water, sewer, storm drainage) extensions to serve the parcels. Two approximately 5 ½-acre detention basins

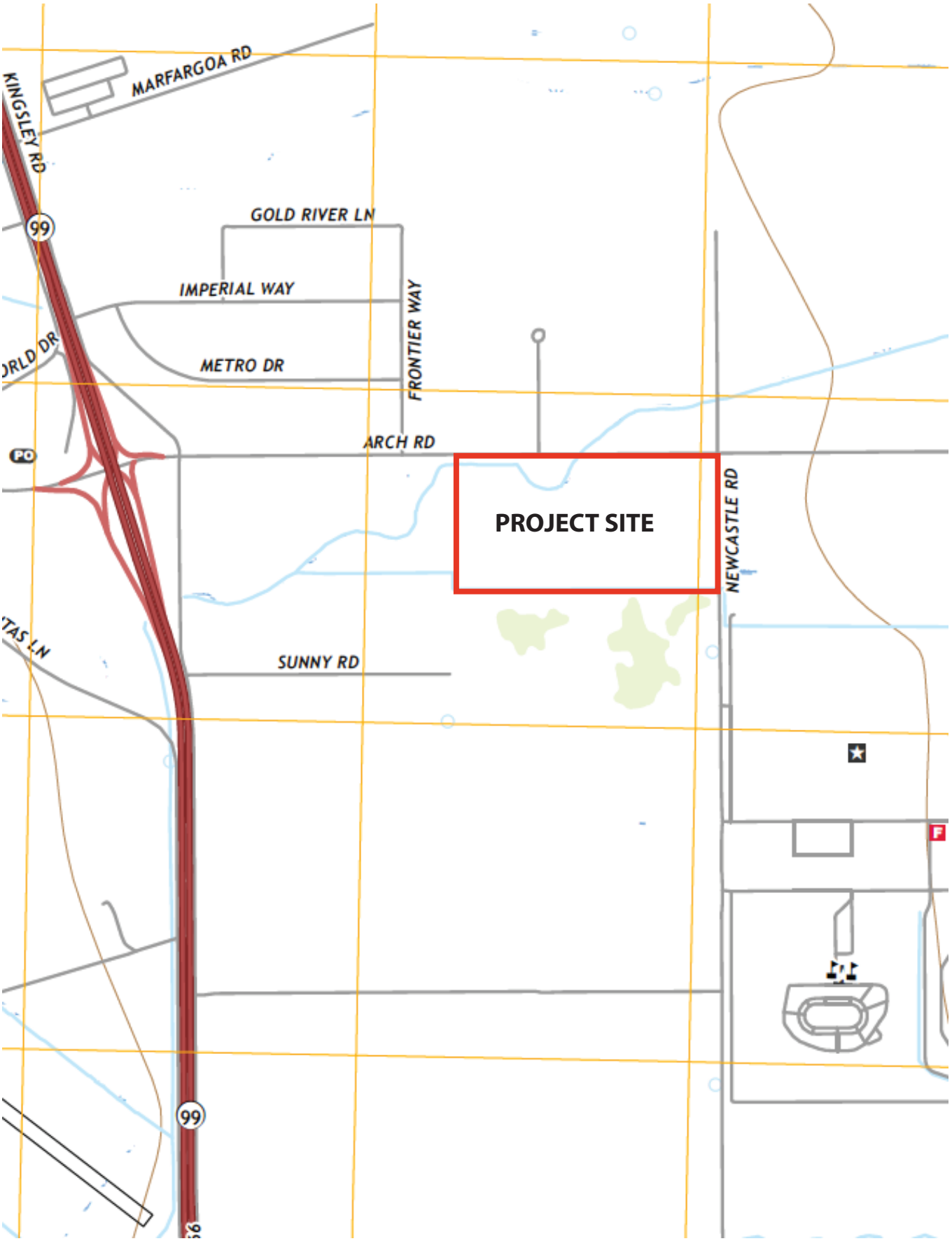
would be installed in the northern portion of the project site adjacent to Weber Slough. These detention basins would serve the project site and the 60-acre parcel to the east. Initially, the detention basins would be connected to the existing detention basin on the north side of Arch Road, and storm water would then be released into Weber Slough. In the long term, it is proposed that the detention basins would connect to Weber Slough through a new storm water outfall structure. Project-related work potentially affecting Weber Slough includes construction of the detention basins, the outfall structure, boring under the slough for the 12-inch diameter water line, and the placement of a new 27-inch diameter sanitary sewer line in Arch Road.

1.3 Approach to the Project Analysis

The project's potential environmental effects are evaluated in Chapter 2.0. The evaluation is based on environmental impact considerations included in the Air Quality and Greenhouse Gas Emissions sections of the CEQA Checklist in Appendix G of the CEQA Guidelines. For each question, Chapter 2.0 determines whether the project would involve: 1) a Potentially Significant Impact, 2) a Less Than Significant Impact With Mitigation Incorporated, 3) a Less Than Significant Impact, or 4) No Impact, which are defined as follows:

> A Potentially Significant Impact occurs when there is substantial evidence that the project would involve a substantial adverse change to the physical environment, i.e., that the environmental effect may be significant, and mitigation measures have not been defined that would reduce the impact to a less than significant level. If there is at least one Potentially Significant Impact identified, an EIR may be required.
>
> An environmental effect that is Less Than Significant with Mitigation Incorporated is a Potentially Significant Impact that can be avoided or reduced to a level that is less than significant with the application of mitigation measures.
>
> A Less Than Significant Impact occurs when the project would involve environmental effects but not a substantial adverse change to the physical environment. No mitigation measures would be required.
>
> A determination of No Impact is self-explanatory.

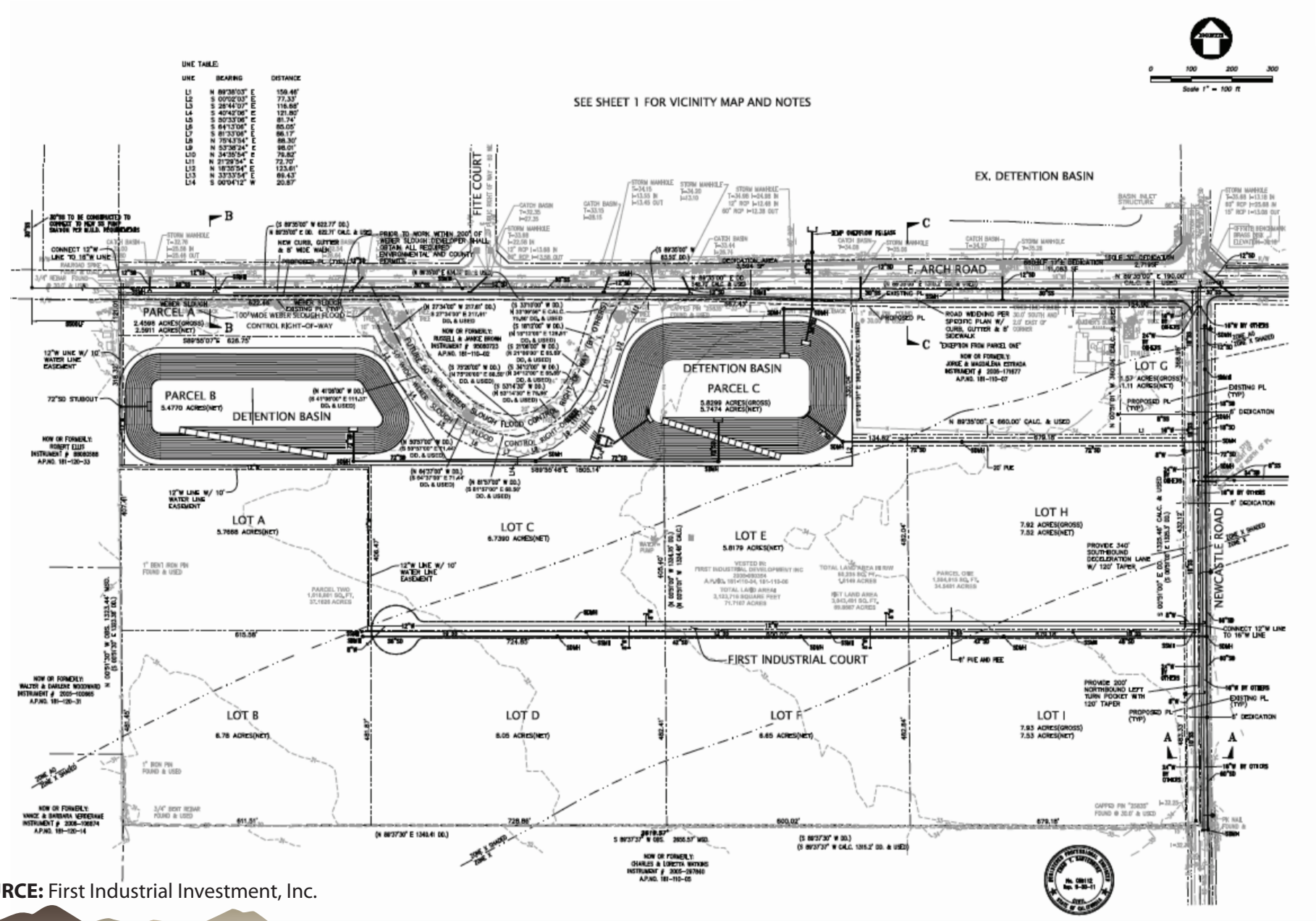
The evaluation would ordinarily prescribe mitigation measures for any potentially significant environmental effects of the project. The analysis does not, however, identify potentially significant environmental effects, and no mitigation is necessary. Mitigating requirements that are established in law and practice are taken into consideration in the analysis.



BaseCamp Environmental

Figure 1-1
VICINITY MAP

Figure 1-2
AERIAL PHOTO



SOURCE: First Industrial Investment, Inc.

Figure 1-3
ARCHTOWN TENTATIVE MAP

2.0 IMPACT ANALYSIS

This chapter presents the analysis of the air quality and GHG impacts of the proposed project. The analysis of air quality impacts is presented in Section 2.1 below, and the analysis of GHG impacts is presented in Section 2.2.

2.1 Air Quality Impacts

2.1.1 Environmental Setting

The project site is within the northern portion of the San Joaquin Valley Air Basin (Air Basin). The Air Basin is bounded generally by the Coast Ranges to the west and the Sierra Nevada and foothills to the east. The prevailing winds are from the west and north, from marine breezes that enter the Air Basin primarily through the Carquinez Strait but also through the Altamont Pass. Surrounding topography results in weak air flow, which makes the Air Basin highly susceptible to pollutant accumulation over time. Summers are hot and dry, and winters are cool. Most of the annual precipitation falls from November through April. The Stockton area enjoys more than 260 days of sunshine annually, but the amount of sunshine is reduced during the winter months. Inversions occur frequently during fall and early winter (SJVAPCD 2015a).

Pollutants of concern for development projects in the Air Basin typically include ozone, particulate matter, and carbon monoxide. Pollutants of concern for industrial and logistical projects also include what are called "toxic air contaminants" (TACs).

Ozone

Ozone is not directly produced; rather, it is a secondary pollutant that is formed from reactive organic gases (ROG) and nitrogen oxides (NO_x) in the presence of sunlight. Automobile emissions represent the principal source of ROG and NO_x, referred to as "ozone precursors." High concentrations of ground-level ozone can adversely affect the human respiratory system and aggravate cardiovascular disease and many respiratory ailments. More specifically, ground-level ozone may:

- Make it more difficult to breathe deeply and vigorously.
- Cause shortness of breath, and pain when taking a deep breath.
- Cause coughing and sore or scratchy throat.
- Inflame and damage the airways.
- Aggravate lung diseases such as asthma, emphysema, and chronic bronchitis.
- Increase the frequency of asthma attacks.

- Make the lungs more susceptible to infection.
- Continue to damage the lungs even when the symptoms have disappeared.
- Cause chronic obstructive pulmonary disease.

People most at risk from breathing air containing ozone include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers. In addition, people with certain genetic characteristics, and people with reduced intake of certain nutrients, such as vitamins C and E, are at greater risk from ozone exposure (EPA 2018a).

Ozone also damages natural ecosystems such as forests and foothill communities, agricultural crops, and some man-made materials, such as rubber, paint, and plastics. To control ozone pollution, it is necessary to control emissions of ROG and NO_x.

Particulate Matter

Particulate matter includes any solid matter suspended in air. Standards are applied to particulates 10 micrometers in diameter or less (PM_{10}), because these particles, when inhaled, are not filtered out prior to reaching the lungs, where they can aggravate respiratory diseases. Particulates originate from automobile traffic, urban construction, grading, farm tilling, and other activities that expose soil and dust. Dry summer conditions and daily winds can increase particulate concentrations. Separate standards have been established for particulate matter that is 2.5 micrometers or less in size ($PM_{2.5}$), sometimes referred to as "fine particulate matter." The $PM_{2.5}$ standards reflect health concerns related to respiration of smaller particles. Fine particulates include sulfates, nitrates, organics, ammonium, and lead compounds originating from some activities in urban areas.

Numerous scientific studies have linked particle pollution exposure to a variety of problems, including:

- premature death in people with heart or lung disease
- nonfatal heart attacks
- irregular heartbeat
- aggravated asthma
- decreased lung function
- increased respiratory symptoms, such as irritation of the airways, coughing or difficulty breathing.

People with heart or lung diseases, children, and older adults are the most likely to be affected by particle pollution exposure (EPA 2018b).

Carbon Monoxide

Carbon monoxide (CO) is an odorless, colorless gas that is highly toxic. It is formed by the incomplete combustion of fuels. The main source of CO in the San Joaquin Valley is on-road motor vehicles. Other mobile sources, miscellaneous processes, and fuel combustion from stationary sources also generate CO. Because of its ability to readily combine with hemoglobin and displace oxygen in the human body, high levels of CO can cause fatigue, headaches, confusion, and dizziness, especially for elderly people or individuals with respiratory ailments.

In 2010, the most recent year for which data are available, approximately 408 tons of ROG and 363 tons of NO_x were emitted each day from sources in the Air Basin. Approximately 284 tons of PM_{10}, of which 77 tons were $PM_{2.5}$, were emitted daily. No total CO emissions were available. Areawide sources account for most of the ROG and particulate matter emissions. Emissions from areawide sources may be either from small individual sources, such as residential fireplaces, or from widely distributed sources that cannot be tied to a single location, such as consumer products and dust from unpaved roads. Most of the NO_x and CO emissions were caused primarily by mobile sources; i.e., motor vehicles (ARB 2013).

Toxic Air Contaminants (TACs)

TACs are pollutants that cause or may cause cancer or other serious health effects such as birth defects, neurological and reproductive disorders, or chronic eye, lung, or skin irritation. TACs also may cause adverse environmental and ecological effects. The State's Air Toxics Inventory includes more than 250 substances considered TACs (ARB 2008a). They include such substances as volatile organic compounds, chlorinated hydrocarbons, asbestos, dioxin, toluene, gasoline engine exhaust, particulate matter emitted by diesel engines, and metals such as cadmium, mercury, chromium, and lead compounds, among many others. Most TACs are emitted by specialized industrial processes.

Diesel particulate matter (DPM) is designated by the State of California as a TAC. A primary source of DPM emissions is combustion from diesel engines, such as those in trucks and other motor vehicles. DPM is of concern because it is a potential source of both carcinogenic (cancer) and non-carcinogenic (non-cancer) health effects, and because it is present at some concentration in all developed areas of the state. The ARB has identified DPM as a major contributor to ambient carcinogenic risk levels; while DPM emissions constituted only about 4% of total air toxic emissions in the state, it accounted for more than 70% of the 2000 carcinogenic risk associated with outdoor ambient levels of all TACs. The ARB has estimated that carcinogenic risks from DPM average 500 cancer cases per million population statewide (ARB 2005). These general risks can be elevated with proximity to the source.

2.1.2 Regulatory Framework

Federal air quality regulation stems from the Clean Air Act, as amended. The Clean Air Act requires the U.S. Environmental Protection Agency (EPA) to establish air quality standards for criteria pollutants. There are six criteria pollutants: ozone, carbon monoxide, particulate matter, nitrogen dioxide, lead, and sulfur dioxide. Two types of standards are established: primary standards to protect human health, based on EPA medical research and specific concentration thresholds derived therefrom; and secondary standards to protect the public welfare from effects such as visibility reduction, soiling, nuisance, and other forms of damage.

The California Clean Air Act provides the framework for California air quality planning. It establishes the State's own set of ambient air quality standards for criteria pollutants. The State standards cover the six criteria pollutants designated by the federal Clean Air Act and four other pollutants: hydrogen sulfide, sulfates, vinyl chloride, and visibility reducing particles. In general, the State ambient air quality standards are more stringent than the corresponding federal standards.

Table 1 shows the attainment status of the Air Basin for both federal primary and state ambient air quality standards. For ozone, the Air Basin is designated Nonattainment/Severe by the State and Nonattainment/Extreme by the federal government. The State also classifies the Air Basin as Nonattainment for PM_{10} and $PM_{2.5}$. The Air Basin is in attainment of, or unclassified for, all other State and federal standards.

Projects within the Air Basin are subject to the regulatory authority of the San Joaquin Valley Air Pollution Control District (SJVAPCD), which implements and enforces air quality regulations in eight counties, from San Joaquin County in the north to western Kern County in the south. The District's responsibilities include air quality standard attainment planning, regulation of emissions from non-transportation sources, and mitigation of emissions from on-road sources.

SJVAPCD has adopted several rules and regulations that are applicable to the project. These regulations are summarized below.

Regulation VIII (Fugitive Dust PM_{10} Prohibitions)

Rules 8011-8081, which together constitute Regulation VIII, are designed to reduce PM_{10} emissions (predominantly dust/dirt) generated by human activity, including construction and demolition activities, road construction, bulk materials storage, paved and unpaved roads, carryout and track out, landfill operations, etc.

Rule 4101 (Visible Emissions)

Rule 4101 prohibits emissions of visible air contaminants to the atmosphere and applies to any source operation that emits or may emit air contaminants.

TABLE 1
SJVAB ATTAINMENT STATUS
WITH FEDERAL AND STATE AMBIENT AIR QUALITY STANDARDS

	Designation/Classification	
Pollutant	**Federal Standards**	**State Standards**
Ozone - One hour	No Federal Standard[a]	Nonattainment/Severe
Ozone - Eight hour	Nonattainment/Extreme[b]	Nonattainment
PM_{10}	Attainment[c]	Nonattainment
$PM_{2.5}$	Nonattainment[d]	Nonattainment
Carbon Monoxide	Attainment/Unclassified	Attainment/Unclassified
Nitrogen Dioxide	Attainment/Unclassified	Attainment
Sulfur Dioxide	Attainment/Unclassified	Attainment
Lead (Particulate)	No Designation/Classification	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility Reducing Particles	No Federal Standard	Unclassified
Vinyl Chloride	No Federal Standard	Attainment

[a] Effective June 15, 2005, EPA revoked the federal 1-hour ozone standard, including associated designations and classifications. EPA had previously classified the Air Basin as extreme nonattainment for this standard. EPA approved the 2004 Extreme Ozone Attainment Demonstration Plan on March 8, 2010 (effective April 7, 2010). Many applicable requirements for extreme 1-hour ozone nonattainment areas continue to apply to the Air Basin.

[b] Though the San Joaquin Valley was initially classified as serious nonattainment for the 1997 8-hour ozone standard, EPA approved Valley reclassification to extreme nonattainment in the Federal Register on May 5, 2010 (effective June 4, 2010).

[c] On September 25, 2008, the U.S. Environmental Protection Agency (EPA) redesignated the San Joaquin Valley to attainment for the PM_{10} National Ambient Air Quality Standard (NAAQS) and approved the PM_{10} Maintenance Plan.

[d] The San Joaquin Valley is designated nonattainment for the 1997 $PM_{2.5}$ NAAQS. EPA designated the Valley as nonattainment for the 2006 $PM_{2.5}$ NAAQS on November 13, 2009 (effective December 14, 2009).

Source: SJVAPCD 2018.

Rule 4601 (Architectural Coatings)

Rule 4601 limits emissions of volatile organic compounds from architectural coatings by specifying storage, clean up and labeling requirements.

Rule 9410 (Employer Based Trip Reduction)

The purpose of Rule 9410 is to reduce vehicle miles traveled (VMT) from private vehicles used by employees to commute to and from their worksites, which in turn would reduce emissions of NO_x, volatile organic compounds (a component of ozone), and particulate matter. Employers are required to implement an Employer Trip Reduction Implementation Plan (ETRIP) for each worksite with 100 or more eligible employees to meet applicable targets specified in the rule. Employers are required to facilitate the participation of the development of ETRIPs by providing information to its employees explaining the requirements and applicability of this rule.

Under this rule, employers shall collect information on the modes of transportation used for each eligible employee's commutes both to and from work for every day of the commute verification period, as defined by using either the mandatory commute verification method or a representative survey method. An ETRIP for each worksite must be submitted to the SJVAPCD, and the ETRIP must be updated annually. Annual reporting includes the results of the commute verification for the previous calendar year along with the measures implemented as outlined in the ETRIP and, if necessary, any updates to the ETRIP.

Rule 9510 (Indirect Source Review)

Rule 9510, also known as the Indirect Source Rule, is intended to reduce or mitigate emissions of NO_x and PM_{10} from new development in the SJVAPCD including construction and operational emissions. This rule requires specific percentage reductions in estimated on-site construction and operation emissions, and/or payment of off-site mitigation fees for required reductions that cannot be met on the project site. Construction emissions of NO_x and PM_{10} exhaust must be reduced by 20% and 45%, respectively. Operational emissions of NO_x and PM_{10} must be reduced by 33.3% and 50%, respectively. Rule 9510 applies to light industrial development projects of 25,000 square feet and larger, so the project would be subject to this rule.

2.1.3 Significance Thresholds

According to Appendix G of the CEQA Guidelines, a project may have a significant impact on the environment if it would do the following:

- Conflict with or obstruct implementation of an applicable air quality plan,
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard,
- Expose sensitive receptors to substantial pollutant concentrations, or
- Result in other emissions, such as those leading to odors, adversely affecting a substantial number of people.

CEQA Guidelines Appendix G states that, where available, significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make significance determinations. In 2015, the SJVAPCD adopted a revised Guide for Assessing and Mitigating Air Quality Impacts, which defines thresholds of significance for the assessment of air quality impacts for projects within SJVAPCD's jurisdiction, along with mitigation measures for identified impacts. Table 2 shows the significance thresholds established by SJVAPCD for projects, as set forth in the Guide for Assessing and Mitigating Air Quality Impacts.

TABLE 2
SJVAPCD SIGNIFICANCE THRESHOLDS AND
PROJECT AIR POLLUTANT EMISSIONS

	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
SJVAPCD Significance Thresholds[1]	**10**	**10**	**100**	**27**	**15**	**15**
Construction Emissions[2]	2.93	4.23	3.69	0.01	0.78	0.29
Above Threshold?	*No*	*No*	*No*	*No*	*No*	*No*
Operational Emissions[3]	3.97	9.96	11.30	0.05	3.30	1.03
Above Threshold?	*No*	*No*	*No*	*No*	*No*	*No*

[1] Applicable to both construction and operational emissions. Figures in tons per year.
[2] Maximum ton emissions in a calendar year.
[3] Tons per year
Notes: ROG – reactive organic gases; NO_x – nitrogen oxide; CO – carbon monoxide; SO_x – sulfur oxide; PM_{10} – particulate matter 10 microns in diameter; $PM_{2.5}$ – particulate matter 2.5 microns in diameter.
Sources: CalEEMod Version 2016.3.2, SJVAPCD 2015a.

The SJVAPCD significance thresholds are based on offset thresholds established under the New Source Review (SJVAPCD Rule 2201). Under the New Source Review, all new permitted sources with emission increases exceeding two pounds per day for any criteria pollutant are required to implement Best Available Control Technology. All permitted sources emitting more than the New Source Review offset thresholds for any criteria pollutant must offset all emission increases that exceed the thresholds. The SJVAPCD's attainment plans, developed to meet air quality standards designed in part to protect human health, demonstrate that project-specific emissions below the offset thresholds will have an impact on air quality that is less than significant (SJVAPCD 2015a).

CO in high concentrations would have adverse health impacts, as previously described. A CO "hotspot" is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO hotspots have the potential to expose receptors to emissions that violate state and/or federal CO standard even if the broader Basin is in attainment for federal and state levels. A project would create no violations of the CO standards if neither of the following criteria are met (SJVAPCD 2015a):

- A traffic study for the project indicates that the Level of Service (LOS) on one or more streets or at one or more intersections in the project vicinity will be reduced to LOS E or F; or

- A traffic study indicates that the project will substantially worsen an already existing LOS F on one or more streets or at one or more intersections in the project vicinity.

The Guide for Assessing and Mitigating Air Quality Impacts has set significance thresholds related to exposure to TACs. These thresholds are set in terms of risk, which are divided into two categories. Carcinogenic risk is expressed as cancer cases per one million. Non-carcinogenic effects are divided into long-term (chronic) health effects such

as birth defects, neurological damage, or genetic damage; and short-term (acute) effects such as eye irritation, respiratory irritation, and nausea. Non-carcinogenic hazard indices (HI) are expressed as a ratio of expected exposure levels to acceptable exposure levels. The SJVAPCD's current thresholds of significance for TAC emissions from the operations of both permitted and non-permitted sources are presented below:

Carcinogens - Maximally Exposed Individual risk equals or exceeds 20 in one million.

Non-Carcinogens - Acute: Hazard Index equals or exceeds 1 for the Maximally Exposed Individual

Chronic: Hazard Index equals or exceeds 1 for the Maximally Exposed Individual

2.1.4 Environmental Impacts and Mitigation Measures

The proposed project would generate air pollutant emissions from heavy equipment powered by diesel or other internal combustion engines that are used in construction activities. After construction work is completed, the proposed project would generate emissions mainly from vehicles entering and exiting the project site, but also from building operations. The occupation of buildings would also involve air emissions from heating and ventilating systems, known as "area emissions."

Project emissions were estimated using the CalEEMod computer program, a modeling program recommended by SJVAPCD. The CalEEMod results are shown in the Appendix to this report and are summarized in Table 2 above. The construction emissions were based on a construction period with 120 working days. Operational emissions are assumed to occur in all 365 days of the year. As a "worst case" scenario, it was assumed that the warehouse uses would involve refrigerated units, which typically use more energy. It should be noted that the estimates provided in Table 2 are for *unmitigated* emissions, meaning emissions that would occur if no measures that would reduce air pollutant emissions were implemented.

POTENTIAL AIR QUALITY IMPACT 1: AIR QUALITY PLAN CONSISTENCY

As indicated in Table 2, all estimated project air pollutant emissions, both construction and operational, would be below the significance thresholds adopted by the SJVAPCD. The largest amount of emissions would come from NO_x operational emissions, yet those emissions would still be below the significance threshold for this pollutant. For both ozone and particulate matter, the SJVAPCD has prepared attainment plans to achieve these standards, and project emissions would not conflict with the attainment of the objectives of these plans.

Although project construction emissions would not exceed significance thresholds, the project would still be subject to SJVAPCD Rule 9510, which requires construction and operational emission reductions of NO_x and PM_{10}. The SJVAPCD will be notified of impending project construction as a part of the required filing of an application for coverage under Rule 9510. Rule 9510 is a routinely applied regulatory program that is

part of the City's development review process and is routinely reflected in conditions of approval for projects. Application of Rule 9510 would further reduce project impacts of NO_x and PM_{10} emissions.

In addition, dust emissions from construction activities would be reduced through the required implementation of SJVAPCD Regulation VIII, enforcement of which is the responsibility of the SJVAPCD. Conformance with plans and specifications is monitoring by City building inspectors. Regulation VIII contains the following dust emission control measures:

- Air emissions related to the project shall be limited to 20% opacity (opaqueness, lack of transparency) or less, as defined in SJVAPCD Rule 8011. The dust control measures specified below shall be applied as required to maintain the Visible Dust Emissions standard.

- The contractor shall pre-water all land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and phase earthmoving.

- The contractor shall apply water, chemical/organic stabilizer/suppressant, or vegetative ground cover to all disturbed areas, including unpaved roads, throughout the period of soil disturbance.

- The contractor shall restrict vehicular access to the disturbance area during periods of inactivity.

- The contractor shall apply water or chemical/organic stabilizers/suppressants, construct wind barriers and/or cover exposed potentially dust-generating materials.

- When materials are transported off-site, the contractor shall stabilize and cover all materials to be transported and maintain six inches of freeboard space from the top of the container.

- The contractor shall remove carryout and trackout of soil materials on a daily basis unless it extends more than 50 feet from site; carryout and trackout extending more than 50 feet from the site shall be removed immediately. The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden. If the project would involve more than 150 construction vehicle trips per day onto the public street, additional restrictions specified in Section 5.8 of SJVAPCD Rule 8041 would apply.

The IS/MND identified three mitigation measures for this issue. Mitigation Measure AIR-1 requires compliance with SJVAPCD Regulation VIII, while Mitigation Measure AIR-3 requires compliance with SJVAPCD Rule 9510, both of which this project is already required to do. Mitigation Measure AIR-2 of the project IS/MND requires actions to reduce construction emissions of ROG and NO_x. Since the CalEEMod run indicates that construction emissions of these pollutants would not exceed SJVAPCD significance

thresholds, this mitigation measure does not seem necessary. Nevertheless, as the IS/MND was adopted with this mitigation measure, the project applicant is required to implement it, resulting in further reductions of ROG and NO_x construction emissions. On this basis, the impacts of the proposed project regarding consistency with the applicable air quality plans would be **less than significant**.

POTENTIAL AIR QUALITY IMPACT 2: CUMULATIVE EMISSIONS

Cumulative impacts on air resources may be assessed at both a regional -in this case, the San Joaquin Valley Air Basin - and a local level, which would be the City of Stockton. The project would involve contributions to potential air quality impacts at both levels.

The potential air quality impacts of planned urbanization in the City of Stockton were addressed in the Stockton General Plan 2040 EIR and were found to be significant. The General Plan 2040 EIR identified mitigation measures, including source controls and transportation management systems, and these measures were incorporated into the General Plan 2040 and are a part of the City's environmental review, permitting and fee structures. Nevertheless, even with the adopted mitigation measures, the cumulative impact of planned urbanization on ozone precursor emissions would be significant and unavoidable. A Statement of Overriding Considerations was adopted for this impact in conjunction with the approval of the Stockton General Plan 2040.

As noted in the discussion under Potential Air Quality Impact 1, both project construction and operational emissions would not exceed the SJVAPCD significance thresholds established for criteria pollutants. The SJVAPCD significance thresholds were developed, in part, to ensure that project emissions did not interfere with the implementation of air quality management plans designed to ensure that the Air Basin meets federal and State air quality standards. Since the CalEEMod results indicate that project operations would not exceed ROG, NOx, and particulate matter significance thresholds, the project would not have a potentially significant cumulative impact on ozone or particulate matter levels in the San Joaquin Valley Air Basin, which is in nonattainment status for both. Also, as noted above, implementation of SJVAPCD rules and adopted mitigation measures would further reduce emissions.

As project emissions would not exceed SJVAPCD significance thresholds, project development would not generate new or more severe air quality impacts that were not analyzed in the Stockton General Plan 2040 EIR. Moreover, the Sanchez-Hoggan project east of the project site was recently approved. This project estimated that traffic activity, a significant contributor to air pollution, would be less than what was estimated for the project site under Stockton General Plan 2040 designations. With the reduced traffic activity from the Sanchez-Hoggan project, cumulative air pollutant emissions in Stockton would be less than estimated by the Stockton General Plan 2040 EIR. Given this, the project would not make a contribution to air quality impacts that is cumulatively considerable. Based on this, project impacts related to cumulative emissions are considered **less than significant**.

POTENTIAL AIR QUALITY IMPACT 3: EXPOSURE OF SENSITIVE RECEPTORS

"Sensitive receptors" refer to those segments of the population most susceptible to poor air quality, which include children, the elderly, and those with pre-existing serious health problems affected by poor air quality. Land uses where sensitive individuals are most likely to spend time also may be called sensitive receptors; these include residential communities, schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, and hospitals (SJVAPCD 2015a).

The nearest sensitive receptor to the project site is a single-family residence adjacent to the northwestern section of the project site. Other potential sensitive receptors include the CDCR facilities to the east. The nearest CDCR building is approximately one-quarter mile from the southeast corner of the project site. The potential impacts of various pollutants on these sensitive receptors are described below.

Criteria Pollutants Other Than CO

In 2018, the California Supreme Court decided *Sierra Club v. County of Fresno*, also known as the Friant Ranch case. In its opinion, the court stated that an EIR prepared for a community plan update and specific plan inadequately described air quality impacts in part because, although it did explain the general health impacts of pollutants, it did not explain the specific impacts the project's emissions would have on health. A brief filed in the case by the SJVAPCD, along with a brief filed jointly by the California Association of Environmental Professionals and the California Chapter of the American Planning Association California, explained that the current state of air quality modeling does not allow for assessing the specific impacts of a project's air quality emissions on human health in an area (SJVAPCD 2015b).

The California Supreme Court stated in its Friant Ranch opinion that "if it is not scientifically possible to do more than has already been done to connect air quality effects with potential human health impacts, the EIR itself must explain why, in a manner reasonably calculated to inform the public of the scope of what is and is not yet known about the Project's impacts." Based upon the information provided by SJVAPCD and the two associations, a specific connection between the project's emissions and health impacts on nearby sensitive receptors cannot be reasonably drawn. As indicated in Table 2, project operational emissions of criteria pollutants would be below SMAQMD significance thresholds. The SJVAPCD significance thresholds were developed in part to ensure attainment of primary federal ambient air quality standards, which were designed to protect human health.

Carbon Monoxide (CO)

As previously described, CO in high concentrations would have adverse health impacts. The project site is located adjacent to the intersection of Arch Road and Newcastle Road, a major intersection in the area. According to a traffic study conducted for the project, the Arch Road/Newcastle Road intersection currently operates at LOS E. With the project, the intersection would continue to operate at LOS E, but delays would be longer. However, the project IS/MND identifies mitigation measures that would allow this

intersection to operate at an acceptable LOS (a minimum of D). In addition, the nearest sensitive receptor to the intersection is the single-family residence, which is more than one-quarter mile west of the intersection. There are no sensitive receptors that would be exposed to CO emissions at this intersection, either with or without the project.

Diesel Particulate Matter (DPM)

Project construction emissions would likely include DPM, which is classified as a TAC. DPM emissions can have adverse health effects on residents if they experience long-term exposure. Construction emissions of DPM would cease once construction is completed and would not result in any long-term exposure for sensitive receptors. However, project operational emissions of diesel particulate matter could have a significant health effect, as these emissions would be long-term. It should be noted that, as the average stay in the CDCR facilities is approximately two years, the length of exposure by residents in these facilities is not expected to be long enough to have adverse health impacts.

A screening-level health risk assessment (HRA) was conducted for the project by Environmental Permitting Specialists. A screening-level HRA refers to an assessment based on conservative estimates of exposure and emissions. The results of the analysis yield a Risk Score that can be translated into being "High", "Medium" or "Low" risk. A Risk Score above 10 signifies potentially significant impacts (a High risk) and that a more detailed and refined risk analysis is warranted. Risk Scores are developed for carcinogenic risk, for non-carcinogenic chronic risk (i.e., toxicity from prolonged exposure), and for non-carcinogenic acute risk (i.e., toxicity with short exposure). There are no chronic or acute risk standards for DPM, only carcinogenic risk. The results of the screening-level HRA indicates that public risk from exposure to toxic emissions from the project could be significant. Therefore, a more detailed HRA was conducted to determine the carcinogenic risk to the residence and whether this risk would be significant. The Appendix to this report contains the more detailed HRA.

As noted above, the carcinogenic risk is considered significant if the Maximally Exposed Individual risk equals or exceeds 20 in one million. For this analysis, carcinogenic risk to the adjacent residence and the CDCR facilities are considered. Taking into consideration the anticipated volume and composition of vehicle traffic generated by the project, the HRA concluded that the carcinogenic risk from project construction DPM emissions at the residence would be approximately 5 in one million. This would be well below the significance threshold of 20 in one million. The nearest CDCR buildings to the project site are expected to experience a carcinogenic risk of no greater than 3 in one million from project construction DPM emissions. CDCR buildings farther away from the project site would experience correspondingly less risk, and buildings in the eastern portion of the CDCR site would experience no measurable increase in carcinogenic risk.

For project operational DPM emissions, a carcinogenic risk of 5 in one million was identified near the intersection of Arch Road and Frontier Way and along Newcastle Road south of the project site. No higher carcinogenic risk was determined elsewhere in the area. At the residence, the carcinogenic risk from project operational DPM emissions would be 1 in one million. The carcinogenic risk to the CDCR buildings adjacent to Newcastle Road would be no greater than 1 in one million and would be correspondingly

less for buildings are a greater distance from the project site. Buildings in the eastern portion of the CDCR site would experience no measurable increase in carcinogenic risk. None of these risk levels would exceed the significance threshold of 20 in one million. For non-carcinogenic risks related to project operational DPM emissions, the Acute Hazard Index is 0.006 and the Chronic Hazard Index is 0.0148. Both are below the significance threshold of 1 established for each.

In summary, sensitive receptors near the project site would not experience exposure to any pollutants, including TACs, that would have a significant adverse impact on health. Project impacts related to exposure of sensitive receptors to emissions would be **less than significant**.

POTENTIAL AIR QUALITY IMPACT 4: ODORS

Odors are more of a nuisance than an environmental hazard. Nevertheless, the Environmental Checklist in CEQA Guidelines Appendix G regards objectionable odors as a potentially significant environmental impact. The Guide for Assessing and Mitigating Air Quality Impacts states that a project should be evaluated to determine the likelihood that it would result in nuisance odors (SJVAPCD 2015a).

Proposed project development is not expected to generate significant odors, other than from vehicle emissions. Such emissions would be localized and would dissipate rapidly outside the project site. As noted above, the nearest sensitive receptor would be the single-family residence adjacent to the project site, and this residence is unlikely to be exposed to substantial odors from project operations, since most activities would be inside buildings. Project impacts related to odors and other emissions are considered **less than significant**.

2.2 Greenhouse Gas Emissions

2.2.1 Environmental Setting

Global climate change is a shift in the "average weather," or climate, of the Earth as a whole. Recent scientific observations and studies indicate that global climate change, linked to an increase in the average global temperature that has been observed, is now occurring. There is a consensus among climate scientists that the primary cause of this change is human activities that generate emissions of greenhouse gases (GHGs) (CAPCOA 2009). GHGs are gases that trap heat in the earth's atmosphere. They include carbon dioxide, the most abundant GHG, as well as methane, nitrous oxide, and other, less abundant gases. GHGs vary in their heat-trapping properties. Because of this, measurements of GHG emissions are commonly expressed in carbon dioxide equivalent (CO_2e), in which emissions of all other GHGs are converted to equivalent carbon dioxide emissions.

GHG emissions in California in 2017 were estimated at 424 million metric tons CO_2e – a decrease of approximately 14.0% from the peak level in 2004. Transportation was the largest contributor to GHG emissions in California, with approximately 40.1% of total emissions. Other significant sources included industrial activities, with 21.1% of total

emissions, and electric power generation, both in-state and imported, with 14.7% of total emissions (ARB 2019).

Total GHG emissions from Stockton in 2005 were an estimated 2,360,932 metric tons CO_2e. Of the total emissions, approximately 48% percent came from on-road transportation and 33% came from building energy use (City of Stockton 2014).

Concerns related to global climate change include the direct consequences of a warmer climate, but also include indirect effects such as reduced air quality, reduced snowpack, higher-intensity storms, and rising sea levels. The State of California, through a collaboration of three agencies, has prepared Climate Change Assessments that provide scientific assessments on the potential impacts of climate change in California and reports potential adaptation responses. The most recent report, issued in 2019, includes assessments of climate change impacts by region, including the San Joaquin Valley. Potential climate change impacts occurring in the San Joaquin Valley include the following (Westerling et al. 2018):

- Acceleration of warming across the region and state.
- More intense and frequent heat waves.
- Higher frequency of catastrophic floods.
- More intense and frequent drought.
- More severe and frequent wildfires.
- Accelerating sea level rise.

The consequences of these impacts would fall on the following sectors in the San Joaquin Valley:

- Agriculture is one of the most vulnerable sectors due in part to more frequent and severe drought, as well as tighter water supply. Regulatory and physical constraints on water supply for agriculture, and environmental factors such as warmer temperatures and more variable precipitation, new pests, and reduced chill hours will affect agricultural decision-making and implementation.
- Ecosystems are highly vulnerable to climate change given existing anthropogenic stressors and the lack of organization of landscape-scale science, funding, and mitigation of adverse impacts within the region. This is particularly the case during prolonged droughts, when scarce water supply disproportionately impacts ecosystems.
- Water resources will be severely impacted by climate change. Regional climate trends are likely to reinforce naturally highly variable precipitation regimes, but with prolonged periods of drought and pronounced precipitation events. At higher elevations, more precipitation as rain and less as snow will result in a fundamental shift in the hydrologic regime, with greater surface water flows over shorter

periods of time. In all, the increased variability in timing and magnitude of surface water will result in a cascade of downstream effects, including changes in reservoir operations for flood protection, less available surface water during summer when irrigation requirements are highest, and decreased water quality. Water quality will be degraded directly, from increased stream temperatures reducing cold water management options for fisheries or from the increase in concentration of contaminants given diminished flows.

- Infrastructure, including urban, water, and transportation systems, may face increased stress from higher temperatures and extreme precipitation events, including droughts and floods. Increasing urbanization in the San Joaquin Valley – and uneven land use planning throughout the region – is likely to hinder efficient and cost-effective investments in regional infrastructure.

- Public health will be exacerbated by many negative impacts from climate change. Warmer temperatures will facilitate the spread of disease, worsen air quality from extended agricultural fallowing, and challenge food security in disadvantaged communities. At the same time, concentration of pollutants in drinking water, particularly in small community water systems and rural household drinking wells, may increase the incidence of waterborne diseases. Disadvantaged rural communities are likely to experience more intense impacts from extreme events compared to urbanized areas.

2.2.2 Regulatory Framework

Unlike the criteria air pollutants described in the preceding Air Quality section, GHGs have no "attainment" standards established by either the federal or state governments. Nevertheless, the EPA has found that GHG emissions endanger both the public health and public welfare under Section 202(a) of the Clean Air Act, due to their impacts associated with climate change (EPA 2009).

State of California

California has addressed climate change on its own initiative as early as 1988, when the California Energy Commission was designated as the lead agency for climate change issues. However, the most significant state activities have occurred since 2005, when executive orders and State legislation established the current framework for dealing with climate change. Several of these actions are described below.

Executive Orders S-3-05 and B-30-15

Executive Order S-3-05, signed by Governor Schwarzenegger in 2005, established GHG emission reduction targets for California. Specifically, GHG emissions would be reduced to the level of emissions in the year 2000 by 2010, to the level of emissions in the year 1990 by 2020, and to 80% below the 1990 emissions level by 2050. The desired 2050 GHG emission reduction is consistent with the objectives of the United Nations Intergovernmental Panel on Climate Change for stabilizing global climate change. The 2020 reduction goal set forth by S-3-05 was codified by Assembly Bill (AB) 32, which is described below.

On April 29, 2015, Governor Brown signed Executive Order B-30-15, which advances the goals of Executive Order S-3-05 by establishing a GHG reduction target of 40% below 1990 emission levels by 2030. The 2030 reduction goal set forth by B-30-15 was codified by Senate Bill (SB) 32, which also is described below.

To date, the 2050 reduction goal has not been made State law, and the State has not prepared any plans to achieve the 2050 goal. In its ruling on *Cleveland National Forest Foundation v. SANDAG* (2017), the California Supreme Court stated that the CEQA lead agency did not abuse its discretion by declining to explicitly engage in an analysis of the consistency of projected 2050 GHG emissions with the goals in the executive order, given the lack of reliable means to forecast how future technology and State legislative action will affect future emissions. The same condition applies to this project; therefore, an analysis of project consistency with the 2050 reduction goal in Executive Order S-3-05 will not be conducted in this EIR.

AB 32

AB 32, the Global Warming Solutions Act of 2006, is State legislation that sets goals of reducing GHG emissions to year 2000 levels by 2010 and to year 1990 levels by 2020. These specific goals are directly related to the Governor's overall objectives established in Executive Order S-3-05. The State's initial planning efforts were oriented toward meeting the legislated 2010 and 2020 goals, while placing the State on a trajectory that will facilitate eventual achievement of the 2050 goal set forth in Executive Order S-3-05.

The ARB has primary responsibility for AB 32 implementation. ARB adopted a Climate Change Scoping Plan in 2008 with the purpose of meeting the AB 32 targets. The Scoping Plan details the various GHG reduction initiatives that will be undertaken by the State or passed down to local governments, and it quantifies the GHG emission reductions associated with each of the initiatives. The 2008 Scoping Plan proposed to reduce GHG emissions from the State's projected 2020 "business-as-usual" emissions by approximately 29%. Under the Scoping Plan, nearly 85% of the GHG reductions would be achieved under a "cap-and-trade" program and "complementary measures," including expansion of energy efficiency programs, increase in the use of renewable energy sources, and low-carbon fuel standards, among others. The remaining 15% would include measures applicable to GHG sources not covered by the cap-and-trade program (ARB 2008b).

The cap-and-trade program is the centerpiece of the GHG reduction program set forth in the Scoping Plan. In general, the program sets a "cap" on the total GHG emissions that would be allowed in California, which gradually decreases over time. Allowances for GHG emissions are sold at auction to industrial activities and utilities that emit large quantities of GHGs, which in turn can sell allowances that are unused to other activities that need more allowances (the "trade" component). The State Legislature recently extended the cap-and-trade program from its original expiration in 2020 to 2030, as part of a strategy to meet GHG reduction targets set by SB 32 (see below).

In May 2014, the ARB approved the First Update to the Scoping Plan. The 2014 Update lays the foundation for establishing a broad framework for continued emission reductions

beyond 2020, on the path to the 2050 target set forth in Executive Order S-3-05. It recommends actions in nine sectors: energy, transportation, agriculture, water, waste management, natural and working lands, short-lived climate pollutants, green buildings, and the cap-and-trade program (ARB 2014).

Recently, the ARB released the California Greenhouse Gas Emission Inventory with data from 2017. As noted above, total state GHG emissions in 2017 were 424 million metric tons CO2e. This was approximately seven million metric tons CO_2e below the 2020 target established by AB 32 (ARB 2019).

SB 32

In 2016, the State Legislature passed, and Governor Brown signed, SB 32. SB 32 extends the GHG reduction goals of AB 32 by requiring statewide GHG emission levels to be 40% below 1990 levels by 2030, in accordance with the target originally established by Executive Order B-30-15. The State has adopted an updated Scoping Plan that sets forth strategies for achieving the SB 32 target. The updated Scoping Plan continues many of the programs that were part of the previous Scoping Plans, including the cap-and-trade program, low-carbon fuel standards, renewable energy, and methane reduction strategies. It also addresses for the first time GHG emissions from the natural and working lands of California, including the agriculture and forestry sectors (ARB 2017). As noted, the cap-and-trade program has been extended from its original expiration in 2020 to 2030.

Executive Order B-55-18

On September 10, 2018, Governor Brown signed Executive Order B-55-18. This executive order set a statewide goal of achieving carbon neutrality no later than 2045. "Carbon neutrality" refers to achieving net zero carbon emissions (i.e., GHGs) by balancing a measured amount of carbon released with an equivalent amount sequestered or offset. After 2045, California shall achieve and maintain net negative GHG emissions. The goals set by Executive Order B-55-18 have not been codified, and the State has not yet prepared any plans to achieve these goals.

City of Stockton

The City of Stockton adopted a Climate Action Plan (CAP) in 2014, in compliance with a Settlement Agreement with the California Attorney General and the Sierra Club related to the City's adopted General Plan 2035 and associated EIR. The CAP "outlines a framework to feasibly reduce community GHG emissions in a manner that is supportive of AB 32 and is consistent with the Settlement Agreement and 2035 General Plan policy" (City of Stockton 2014).

The CAP sets a GHG emission reduction target of 10% below 2005 GHG emission levels by 2020, or approximately 20.6% below 2020 "business as usual" GHG emissions (i.e., 2020 GHG emissions that are unmitigated), which is the level by which the State has set its emission reduction goal. Approximately 83% of the reductions needed to achieve the City's GHG reduction goal are achieved through state-level programs, and 17% are achieved through City-level programs. The largest GHG reductions are identified in the areas of building energy (both energy efficiency and renewable energy), transportation,

and waste. It should be noted that the GHG emission inventory on which CAP targets and policies are based did not include heavy industrial sources.

Approximately 1% of the total reduction would be achieved through a Development Review Process through which development projects requiring discretionary approval from the City must demonstrate a 29% reduction from 2020 business-as-usual GHG emissions, consistent with the SJVAPCD target. Appendix F of the CAP has a Climate Impact Study Process, which is part of the Development Review Process, that describes BMPs to reduce GHG emissions from construction and operational activities. Development must identify the BMPs or other mitigation that would provide the reduction in GHG emissions (City of Stockton 2014).

2.2.3 Significance Thresholds

According to Appendix G of the CEQA Guidelines, a project may have a significant impact on the environment if it would do the following:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

This analysis is conducted in accordance with CEQA Guidelines Section 15064.4, which states that a lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. CEQA Guidelines Section 15064.4(b) states that a Lead Agency should consider the following factors, among others, when assessing the significance of impacts from GHG emissions on the environment:

- The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Some jurisdictions have established quantitative thresholds for determining the significance of project GHG emissions from construction activities and project operations. Neither the City, San Joaquin County, nor SJVAPCD has established such quantitative significance thresholds, although the SJVAPCD recommends a 29% reduction from business-as-usual GHG levels for project operational emissions.

As noted above, the CAP determined that approximately 83% of the GHG reductions targeted by the City would be accomplished by statewide measures, while 17% would be accomplished by local measures. Local measures include the Development Review

Process, building energy use measures, land use and transportation measures, and waste generation and water conservation measures, among others. Based on these percentages, approximately 5% of GHG reductions would be required by local measures. For the purposes of this analysis, a project that can attain at least a 5% reduction in GHG emissions from business-as-usual levels would have impacts on GHG reduction plans that would be less than significant.

2.2.4 Environmental Impacts and Mitigation Measures

POTENTIAL GHG IMPACT 1: PROJECT GHG CONSTRUCTION EMISSIONS

The CalEEMod model estimated the total GHG construction and operational emissions associated with the proposed project site development (see Appendix). Table 3 presents the results of the CalEEMod run.

TABLE 3
PROJECT GHG EMISSIONS

GHG Emission Type	Unmitigated Emissions (metric tons CO_2e)	Mitigated Emissions (metric tons CO_2e)
Construction[1]	2,492	2,492
Operational[2]	12,745	11,736

[1] Total emissions.
[2] Annual emissions.
Source: California Emissions Estimator Model v. 2016.3.1.

Based on results from the CalEEMod run, total project GHG construction emissions would be approximately 2,492 metric tons CO_2e, and maximum project construction GHG emissions for a calendar year would be approximately 1,355 metric tons CO_2e. Construction emissions would occur only during construction work and would cease once work is completed. Implementation of rules described in the Air Quality section that are designed to reduce construction air pollutant emissions is also expected to reduce incrementally the amount of GHGs generated by project construction.

The ARB has implemented the Regulation for In-Use Off-Road Diesel Fueled Fleets, which applies to all self-propelled off-road diesel vehicles 25 horsepower or greater used in California and most two-engine vehicles (except on-road two-engine sweepers). The overall purpose of the Off-Road Regulation is to reduce emissions of NO_x and particulate matter from off-road diesel vehicles operating within California. The Off-Road Regulation imposes limits on idling and requires a written idling policy. It also requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or by installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The requirements and compliance dates of the Off-Road Regulation vary by fleet size. Compliance with the Off-Road Regulation would lead to an incidental reduction in GHG emissions, though the amount of this reduction cannot be determined.

The project IS/MND identified Mitigation Measure AIR-4, which is designed to reduce GHG emissions associated with the project, including emissions associated with construction. Implementation of this mitigation measure would further reduce GHG emissions. Given this, project impacts related to construction GHG emissions are considered **less than significant**.

POTENTIAL GHG IMPACT 2: PROJECT GHG OPERATIONAL EMISSIONS AND CONSISTENCY WITH GHG REDUCTION PLANS

GHG emissions are related to global climate change. As such, the impacts of a project's GHG emissions are considered cumulative in nature. The potential GHG impacts of planned urbanization in the City of Stockton were addressed in the Stockton General Plan 2040 EIR and were found to be significant. The General Plan 2040 EIR identified mitigation measures, including adoption of the CAP, and these measures were incorporated into the General Plan 2040 and are a part of the City's environmental review, permitting and fee structures. Nevertheless, even with the adopted mitigation measures, the cumulative impact of planned urbanization on GHG emissions would be significant and unavoidable. A Statement of Overriding Considerations was adopted for this impact in conjunction with the approval of the Stockton General Plan 2040.

Project operational GHG emissions, mainly from vehicle use, are estimated to generate approximately 12,745 metric tons CO2e annually without mitigation (see Table 3). The CalEEMod run incorporated measures that mitigate GHG emissions based on the following conditions:

- The project would construct sidewalks that would become part of an existing sidewalk network in the vicinity.
- The project would implement an employee trip reduction program in accordance with SJVAPCD Rule 9410 (see Section 2.1.2).
- In accordance with SBX7-7, the project would implement water conservation measures that lead to a 20% reduction in indoor and outdoor water use.
- In accordance with AB 341, the project would divert 75% of its solid waste stream through recycling and other measures.

With incorporation of these measures, estimated operational GHG emissions would be reduced to approximately 11,736 metric tons CO_2e annually, an approximately 7.9% reduction in GHG emissions from unmitigated levels. As noted, a project that can show GHG reductions greater than 5% from the business-as-usual (unmitigated) level can be said to be consistent with the reduction goals of the Stockton CAP. Since the Stockton CAP goals are intended to be consistent with both the State's and SJVAPCD's plans, this reduction would be consistent with the goals of these plans.

Per SB 32, the State has set a 2030 reduction target of 40% below 1990 GHG emission levels. The Stockton CAP does not have 2030 reduction targets. However, assuming the same growth in business-as-usual GHG emissions that was projected to occur between 2005 and 2020 by the CAP, the total 2030 business-as-usual GHG emissions in Stockton

would be 3,025,292 metric tons CO_2e. Based on information in the CAP, the 2030 reduction target (40% below 1990 emissions) would be 1,074,672 metric tons CO_2e. Therefore, the percentage reduction from business-as-usual levels that would be required in 2030 would be approximately 64.5%.

The 2017 Scoping Plan proposes various measures to achieve the 2030 target. Most of these are State measures, such as use of the cap-and-trade program, the Short-Lived Climate Pollutant Plan, and achievement of the 50% renewable sources of electricity in the Renewables Portfolio Standard. Based on estimates in the 2017 Scoping Plan, State actions would account for 89.8% of GHG reductions needed by 2030, with local actions accounting for approximately 9.3% of reductions. Applying this ratio to the percentage reduction for 2030, then approximately 6.0% of the reduction from 2030 business-as-usual levels would be achieved by local measures, including the Development Review Process. A project that can shows GHG reductions greater than 6.0% can be said to be consistent with the reduction goals of SB 32. Mitigated project GHG operational emissions would exceed this percentage. Therefore, the project would be consistent with the reduction goals of SB 32.

As project emissions would not exceed GHG reduction targets, project development would not generate new or more severe GHG impacts that were not analyzed in the Stockton General Plan 2040 EIR. Moreover, as noted above, the project IS/MND identified Mitigation Measure AIR-4, which is designed to reduce GHG emissions associated with the project. Actions in the mitigation measure are intended to improve energy efficiency, promote use of renewable energy, conserve water, reduce and recycle solid waste, and address transportation emissions. Implementation of these actions would reduce operational GHG emissions, directly and indirectly. Because of this, the project would not make a contribution to GHG impacts that is cumulatively considerable.

In summary, project GHG operational emissions would be consistent with both the GHG reduction goals of the Stockton CAP to 2020 and the GHG reduction goals of SB 32 for 2030. Project operational impacts on GHG emissions, both project-specific and cumulative, would be **less than significant**.

3.0 CONCLUSION AND REFERENCES

3.1 Conclusion

The project proposes the construction of the Archtown Industrial Project, which proposes development of light industrial and warehouse uses. The project would generate air pollutant and GHG emissions, mainly from vehicle traffic. Estimates of these emissions were developed using CalEEMod, with inputs based on project information.

The results of the CalEEMod runs indicate that the project would not generate air pollutant emissions, either construction or operational, that would exceed the significance thresholds established by SJVAPCD. The project would generate diesel particulate matter, mainly from truck exhaust. Diesel particulate matter (DPM) is considered a TAC, which could lead to an increased carcinogenic risk for nearby sensitive receptors. However, the HRA prepared for the project indicates that the project would not lead to an increase in carcinogenic risk for nearby receptors that would exceed the SJVAPCD threshold. It also would not increase non-carcinogenic (acute and chronic) risks. The project would not generate any significant amounts of odors. Air quality impacts of the project are considered less than significant.

While the project would generate GHG emissions, these emissions would be consistent with the reduction targets of applicable GHG reduction plans. GHG impacts of the project would be less than significant.

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APPENDIX TO AIR QUALITY/GHG ANALYSIS
HEALTH RISK ASSESSMENT

Draft Analysis of Public Health Risks At a Proposed Industrial Development

Stockton, California

July 26, 2020

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SECTION 1: INTRODUCTION

1.1 Background and Project Area

Environmental Permitting Specialists (EPS) has been retained by BaseCamp Environmental, Inc. (BaseCamp) to evaluate public health risks associated with the proposed Archtown Industrial Project to be located in Stockton (San Joaquin County County), California. This risk analysis is in support of the Negative Declaration being reviewed by the City of Stockton, Planning Department.

The proposed project development would consist of warehouse buildings that would occupy 1,200,000 square feet on a 27.5 acre lot. Figures 1-1 and 1-2 illustrate the project location and site map respectively. Construction is expected to begin in April 2021 and be completed by September 2023 with occupancy expected in the fall of 2023.

Both construction related and long-term health risks were evaluated. Public health risks refer to three (3) types of risks. These are:

1. Cancer Risk
2. Acute Non-Cancer Risk
3. Chronic Non-Cancer Risk

The objective of the risk assessment is to determine if the proposed project is likely to expose nearby residents or workers to significant health risks. The criteria used to determine if health risks are significant is discussed later in this Section.

1.2 Scope of the Risk Assessment

Preparation of risk assessments is a three-step process. The first step is to identify sources of toxic air contaminants (TACs) that may lead to public health risks. The second step is to assess the amounts of contaminants that may reach the public (exposure assessment). The last step is to calculate the magnitude of the health risk as a result of exposure to harmful contaminants (risk characterization).

The Office of Environmental Health Hazard Assessment (OEHHA), and the San Joaquin Valley Air Pollution Control District (SJVAPCD) have provided guidance on the procedures that should be used, including, the types of risks to be evaluated for each TAC, toxicological data for individual contaminants and recommended exposure pathways. The current analysis relies on guidance from both of these agencies.

1.3 Significance Criteria

The following significance criteria are used in this report to assess the significance of public health risks. These criteria are based on the SJVAPCD Guidelines for Assessing and Mitigating Air Quality Impacts. These Guidelines are designed to inform the public and the Lead Agencies of the extent of airborne emissions from stationary sources and the potential public health impacts associated with such emissions.

Table 1-1
Thresholds of Significance for Public Health Risks

Risk Metric	Project Level	Cumulative
Residential Lifetime Cancer Risk Worker Cancer Risk	20 cancers per million	SJVAPCD has Not Established Thresholds for Cumulative Impacts. Lead Agencies May Select Cumulative Thresholds.
Workplace Cancer Risk	20 cancers per million	
Chronic Hazard Index	1	
Acute Hazard Index	1	

1.4 Report Organization

This report is divided into four Sections and two Appendices. Immediately following this Introduction, Section 2 discusses the short-term (construction related) and long-term (operational or occupancy phase) emissions associated with the project. This is followed by Section 3 that describes the exposure assessment. This assessment described the data and tools used to determine the dispersion pattern of emissions from the project. This analysis takes into account the location of nearby homes and businesses, local wind patterns and topography. Section 4 describes the risk calculation that combines the results from Sections 2 and 3 to calculate health risks. The report concludes with Section 4 that discusses the results and the significance of the findings. Technical data and calculations appear in the Appendices.

Figure 1-1
Vicinity Map

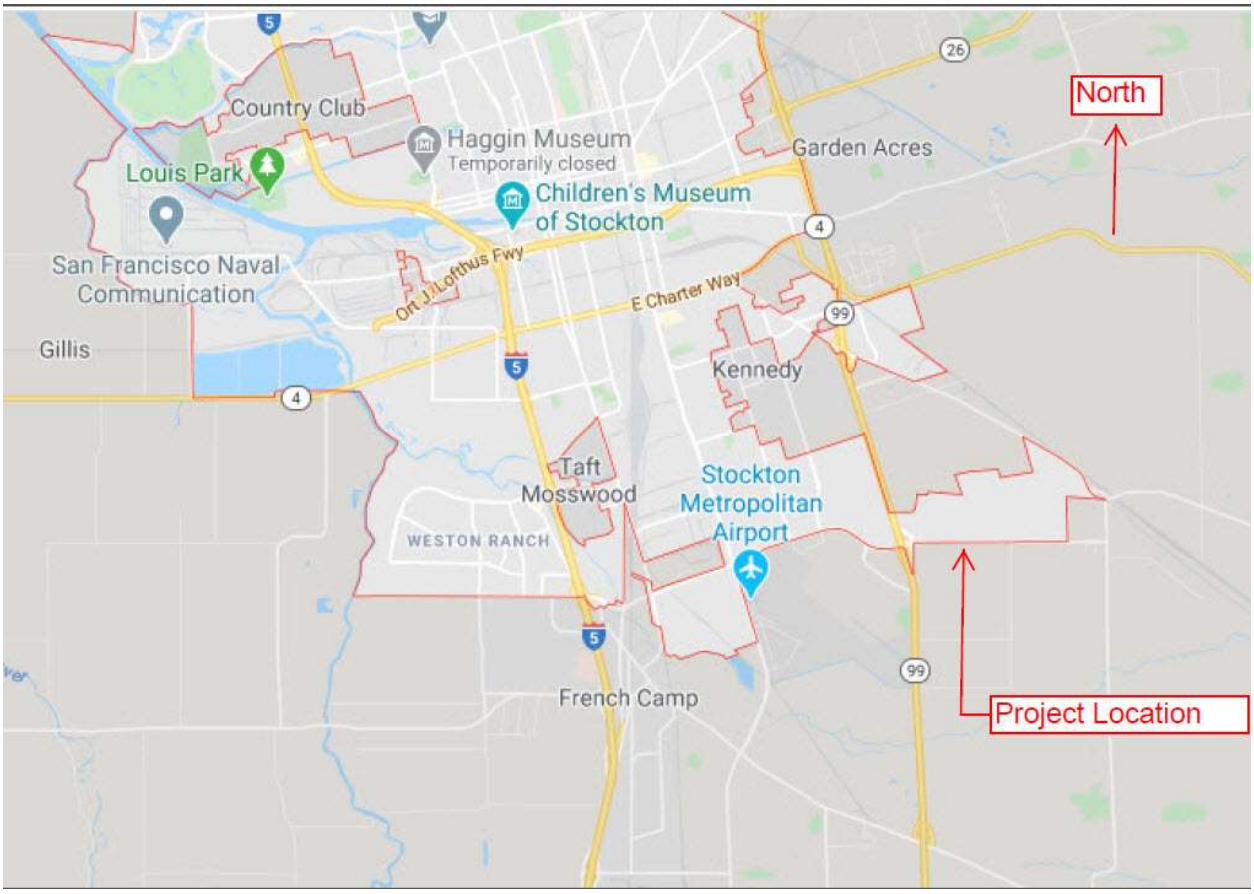
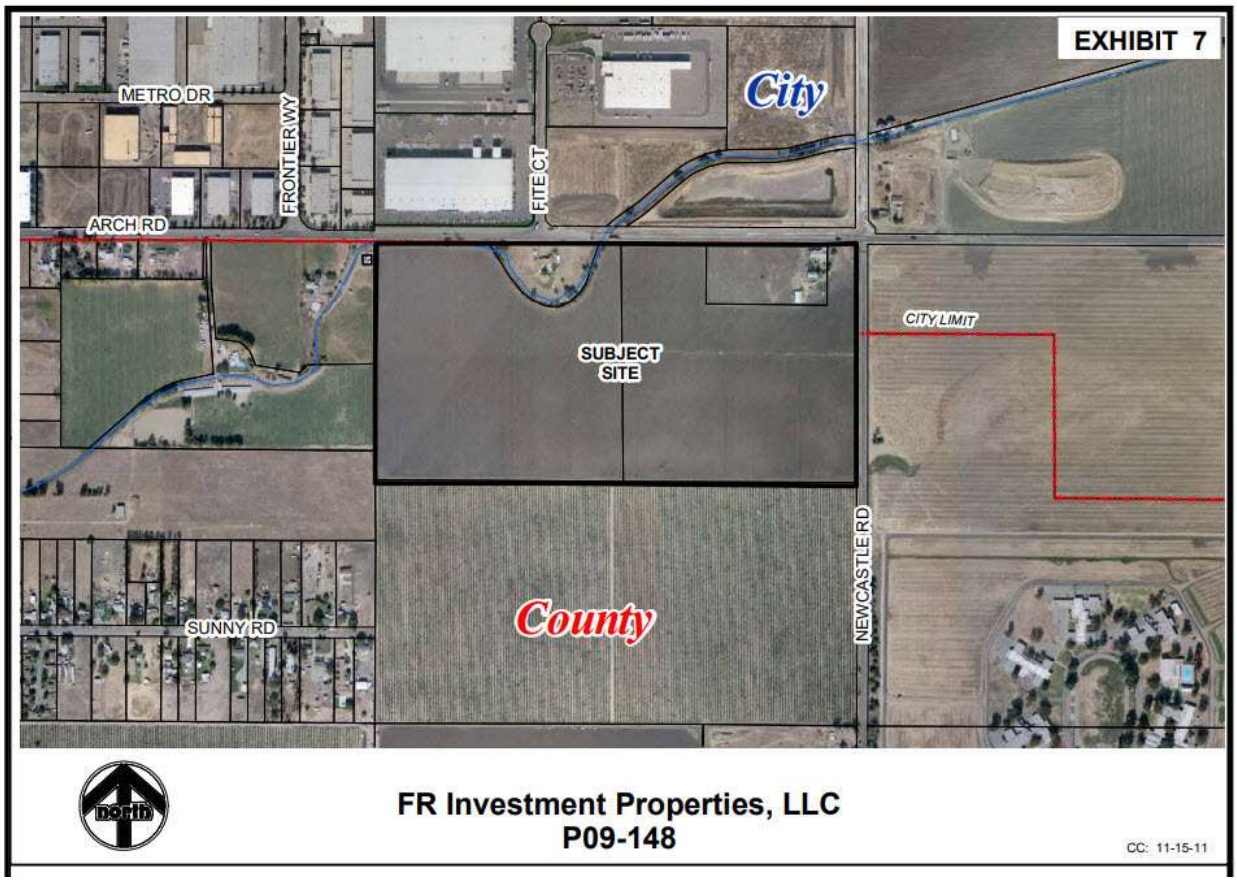


Figure 1-2
Site Map

Source: FR Investment Properties, LLC



SECTION 2: EMISSIONS SUMMARY

EPS evaluated both short-term and long term emissions of toxic air contaminants (TACs) for this project. Short-term emissions are associated with the construction phase and typically last 1 to 3 years depending on the project and construction schedule. Long-term emissions are associated with operational or occupancy phase.

EPS relied, in part, on air quality analysis completed by BaseCamp that provided annual emissions during the construction and operational phases. For the construction phase EPS relied on the air quality emissions modeling completed by BaseCamp staff that provided annual emission rates of exhaust PM-2.5. Annual PM-2.5 is considered a surrogate for diesel particulate matter (DPM) released from construction equipment.

For the operational (occupancy) phase, the BaseCamp data were supplemented with additional data such as traffic studies, emissions from idling of diesel trucks, on-site movement of trucks, and emissions from transport refrigeration units (TRUs). The sources of emissions associated with the operational phase are summarized in Table 2-1.

2.1 Construction (Short-Term) Emissions

The main toxic air contaminant associated with construction is diesel exhaust consisting of fine particulate matter from construction equipment. As noted previously, emissions of fine particulate matter (Exhaust PM-2.5) from construction equipment are used as a surrogate of DPM.

EPS reviewed the air quality analysis that included emissions modeling reports using the California Emissions Estimation Model (CalEEMod) reports providing daily and annual emissions for the construction and operational phases. Construction would occur between April 2021to June 2023 for a total of 29 months. Average annual emissions during this period were estimated to range from 0.0367 to 0.1101 tons per year with an average of 0.0851 tons (170.2 lbs) of PM-2.5 per year over the 29 month period. A copy of the CalEEMod report is provided in Appendix A.

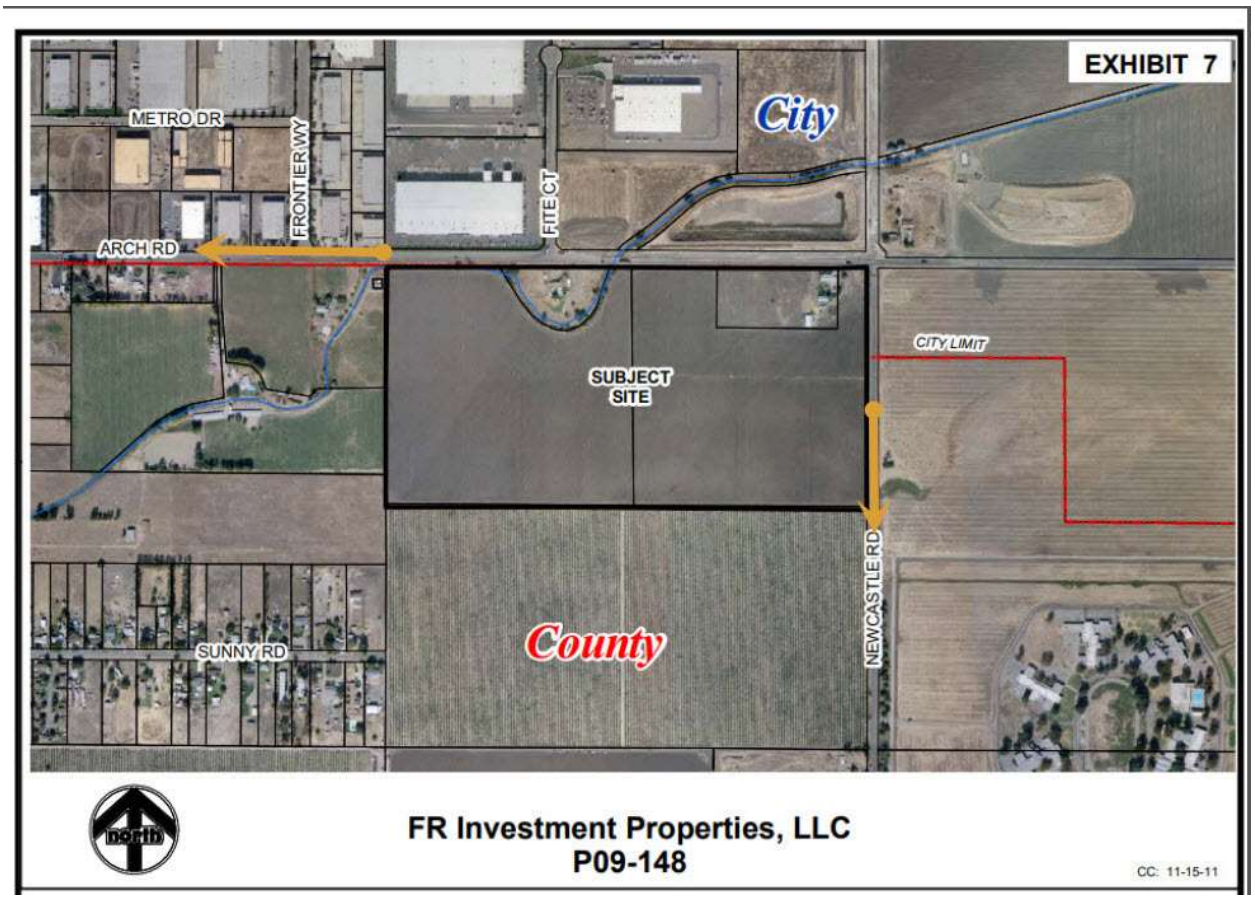
2.2 Operational (Long-Term) Emissions

Long-term (occupancy phase) toxic emissions are associated with several on-site and off-site activities. On-site emissions include emissions from truck idling, TRUs and on-site travel of light duty vehicles and heavy-duty trucks. The analysis is based on a daily traffic volume of 2,016 vehicles per day, seven days per week. 25% of these vehicles are assumed to be heavy duty trucks. The remainder 75% are assumed to be automobiles and light-duty trucks. A summary of traffic data used in the analysis is summarized in Appendix B.

Off-site emissions would be associated with vehicle travel to and from the project site. The main vehicle routes would be West along Arch Road and South along Newcastle Road (Figure 2-1). Off-site vehicle emissions were calculated within ¼ mile of the project boundary. The ¼ mile "zone of influence" is recommended by District staff

Table 2-1 Summary of Operational (Occupancy Phase) Emission Sources	
On-Site Emission Sources	**Off-Site Emission Sources**
Truck Idle - DPM [emissions based on EMFAC 2017]	Heavy Duty Trucks - DPM, [emissions based on EMFAC 2017]
Transport Refrigeration Units - DPM [emissions based on CARB (date)]	Automobile/Light Truck Travel - various TACs [emissions from CARB 2004]
On-Site Truck Movement - DPM [emissions based on EMFAC 2017]	

Figure 2-1
Travel Routes Used to Analyze Off-Site Vehicle Emissions



A summary of operational emissions is provided in Table 2-2. Detailed calculations are provided in Appendix C.

Table 2-1
Summary of Operational Emissions in Pounds per Day

	On-Site	Off-Site[1]			
	HD Truck Idle, TRUs, etc.	HD Trucks	Autos + Light Duty Trucks		
Daily Trips	504	504	1,512		2016
Pollutant					Total (lbs/day)
DPM	12.36	2.59	0		14.95
1,3 Butadiene			1.02		1.02
Acetaldehyde			0.84		0.84
Benzene			13.76		13.76
Formaldehyde			3.91		3.91

Note 1: These emissions are for each 1/4 mile segment shown in Figure 2-1.

SECTION 3: EXPOSURE ASSESSMENT

Exposure assessment involves translating the emission rate (e.g., lbs/hr) of individual toxic air contaminants (presented in Tables 2-1 and 2-4) into the concentration (e.g., grams/cubic meter or parts per million) of each toxic air contaminant. The key step in performing an exposure assessment is the application of an air dispersion model. The dispersion model incorporates the local meteorological data (wind speed, wind direction, local temperature, inversion heights, etc.), stack height, exhaust flow characteristics, into the concentration of individual air contaminant. EPA and the SJVAPCD recommended AERMOD dispersion model (Version 19191) was employed in the current exposure assessment. The plot files created using Lakes Environmental (AERMODVIEW) Version 9.8.3 were exported into the HARP model.

This section discusses the model set-up, the extent of the modeling area, and the choice and duration of meteorological data.

3.1 Model Set-Up

The following regulatory default options were used. They are based on the latest EPA guidance on running AERMOD.

- Use of Calm Wind Processing
- Use of Missing Data Processing

For the construction phase, the emissions were modeled as a single area source. For the operational phase, emissions were modeled as two single area source plus additional line sources representing roadways leading to the project sites. See Figure 3-1.

Emissions from the logistics park were modeled as a ground based area source. Emissions from vehicle movement were modeled as line sources. The line sources are treated as a series of small area sources in the AERMOD model. Adjustment due to changes in elevation in the modeling area were included using the digital elevation model (DEM)[1] terrain data.

For the construction phase, emissions were assumed to occur between 7 am and 5 pm. For the operational phase, emissions were assumed to occur 24/7.

3.2 Modeling Grid and Coordinate System

A rectangular (x-y) Cartesian coordinate system was used. A region 2,950 x 2,950 meters (1.8 miles x 1.8 miles) was used. The modeling region divided into 50 meter cells for a total of 3,600 individual receptors in the vicinity of the project area. In addition to the modeling grid, discrete receptors were located at each of the two residences located along Arch Road adjacent to the project site. See Figure 3-1 for a layout of the modeling grid.

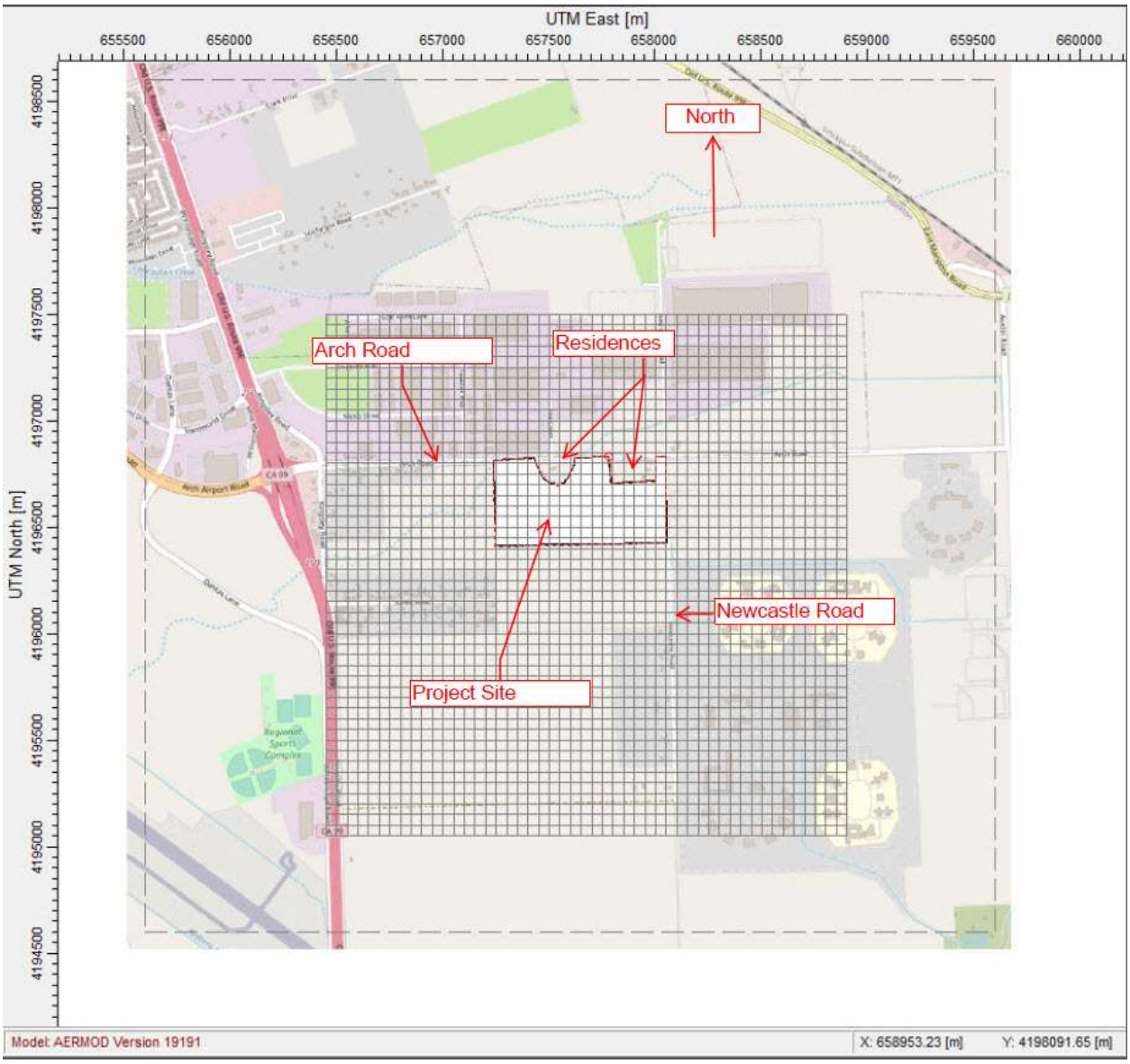
3.3 Meteorological Data

Five years of hourly meteorological data from 2013 to 2017 (total x x x hrs) was used in the exposure assessment. The surface data (wind speed, wind direction, temperature, etc.) were recorded at Stockton Airport located 1.5 miles to the Southwest. These data were obtained from the District website and are considered representative of the project site.

In addition to surface meteorological data, hourly inversion height data are also required. Four years of data from the nearest upper air station (Oakland Airport, CA) were used to develop hourly inversion heights.

[1] Information available at: https://www.usgs.gov/faqs/what-are-digital-elevation-models-dems?qt-news_science_products=0#qt-news_science_products

Figure 3-1
Lay-Out of Modeling Grid and Emission Sources



SECTION 4: HEALTH RISK ANALYSIS

Health risks from exposure to various toxic air contaminants is discussed in this section. The emission rates of various TACs discussed in Section 2 are used as a basis to quantify various health risks. EPS used the HARP2 risk model developed by CARB and the Office of Environmental Health Hazard Assessment (OEHHA)[2] to calculate the actual health risks. As noted in Section 1, three types of health risks were calculated (cancer, chronic non-cancer and acute non-cancer).

4.1 Cancer Risks – Construction Phase

The modeling results for the construction phase are shown in Figure 4-1. This figure shows the spatial distribution of cancer risk in the vicinity of the project site. The results show that the cancer risk varies between 3.9 to less than 0.1 cancers per million depending on location. The maximum cancer risk at occurs at the residence adjacent to the project site. The cancer risk at this location is 3.93 cancers per million.

4.2 Cancer Risks – Operational Phase

The spatial distribution of residential (70 year) cancer risk is shown in Figure 4-2. The results show that the cancer risk varies between 5.9 to less than 0.1 cancers per million depending on location. The maximum residential cancer risk is 5.93 at a residence along Arch Road just West of Frontier Way. The maximum worker risk varies between 0.5 to less than 0.01 cancer per million. The maximum worker risk is at the Northwest corner of Arch Road and Frontier Way. The spatial distribution of work risk is shown in Figure 4-3.

The maximum non-cancer risks at this location are calculated in terms of a hazard index (HI) as follows:

Maximum Chronic Hazard Index (HI):	0.0148
Maximum Acute Hazard Index (HI):	0.0060

Excerpts of the HARP2 model showing the calculated health risks are provided in Appendix D.

[2] OEHHA Hotspots Analysis and Reporting Program (HARP) available at: https://ww3.arb.ca.gov/toxics/harp/harp.htm

Figure 4-1
Spatial Variation of Residential Cancer Risk per Million
Construction Phase

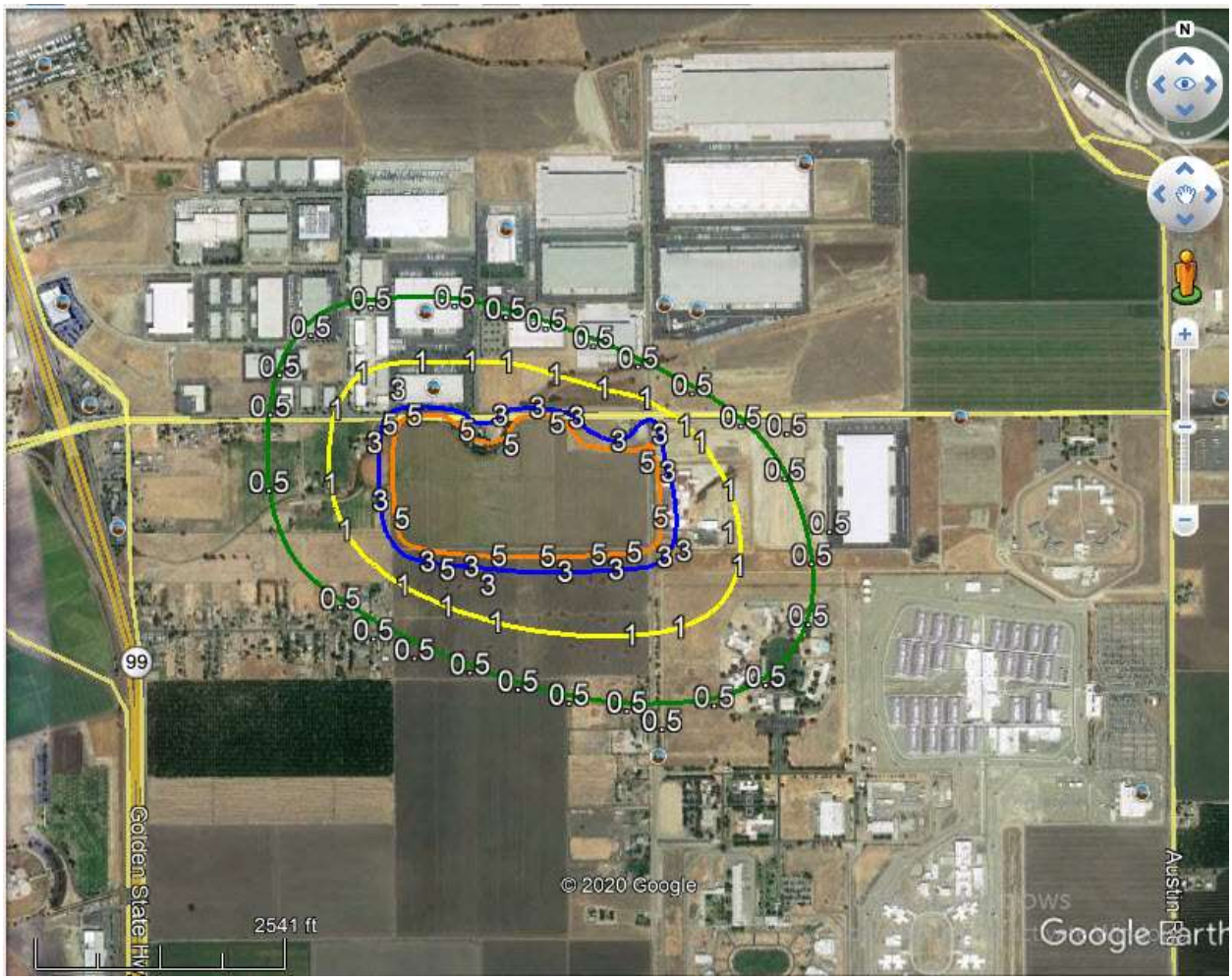


Figure 4-2
Spatial Variation of Residential Cancer Risk per Million
Operational Phase

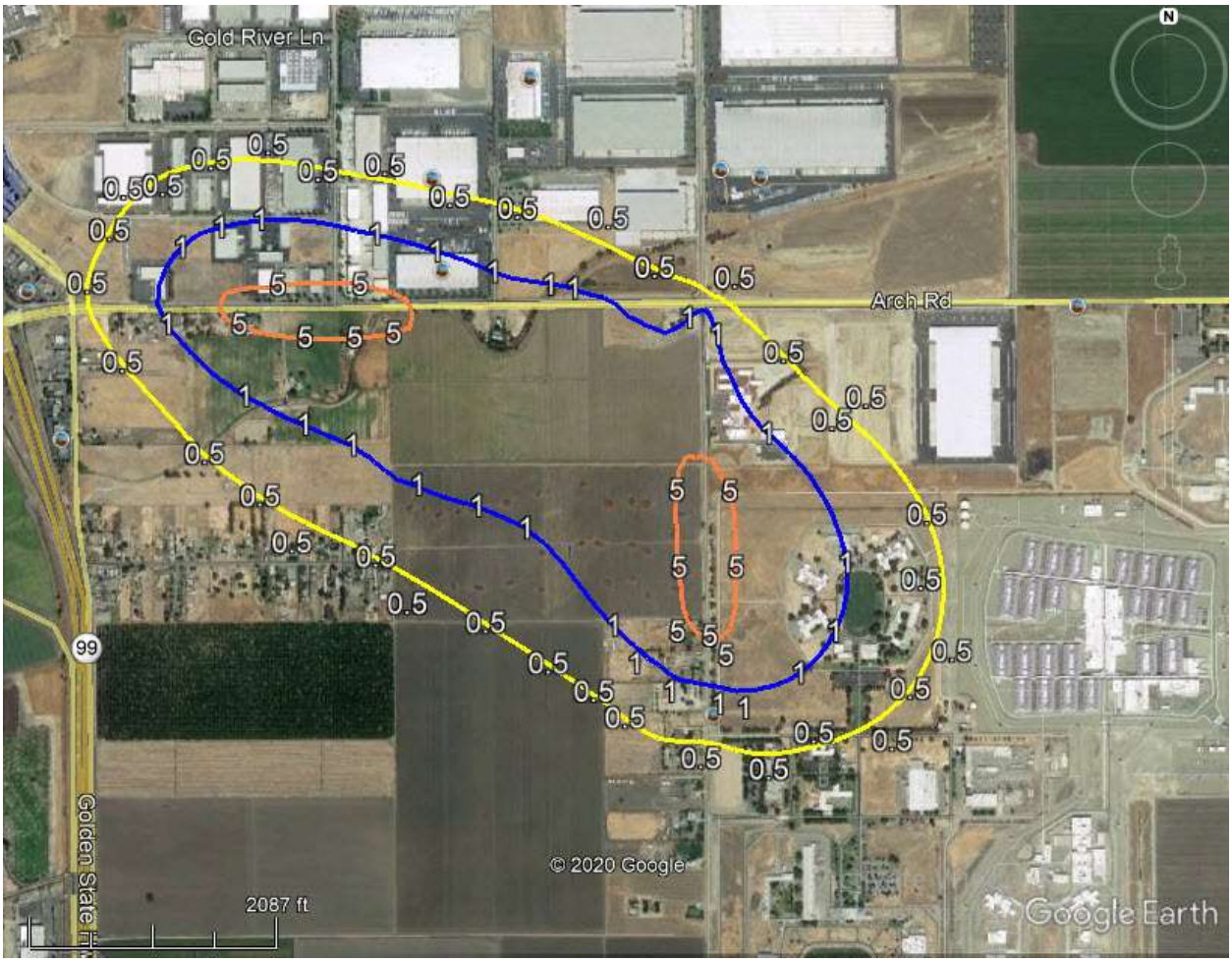
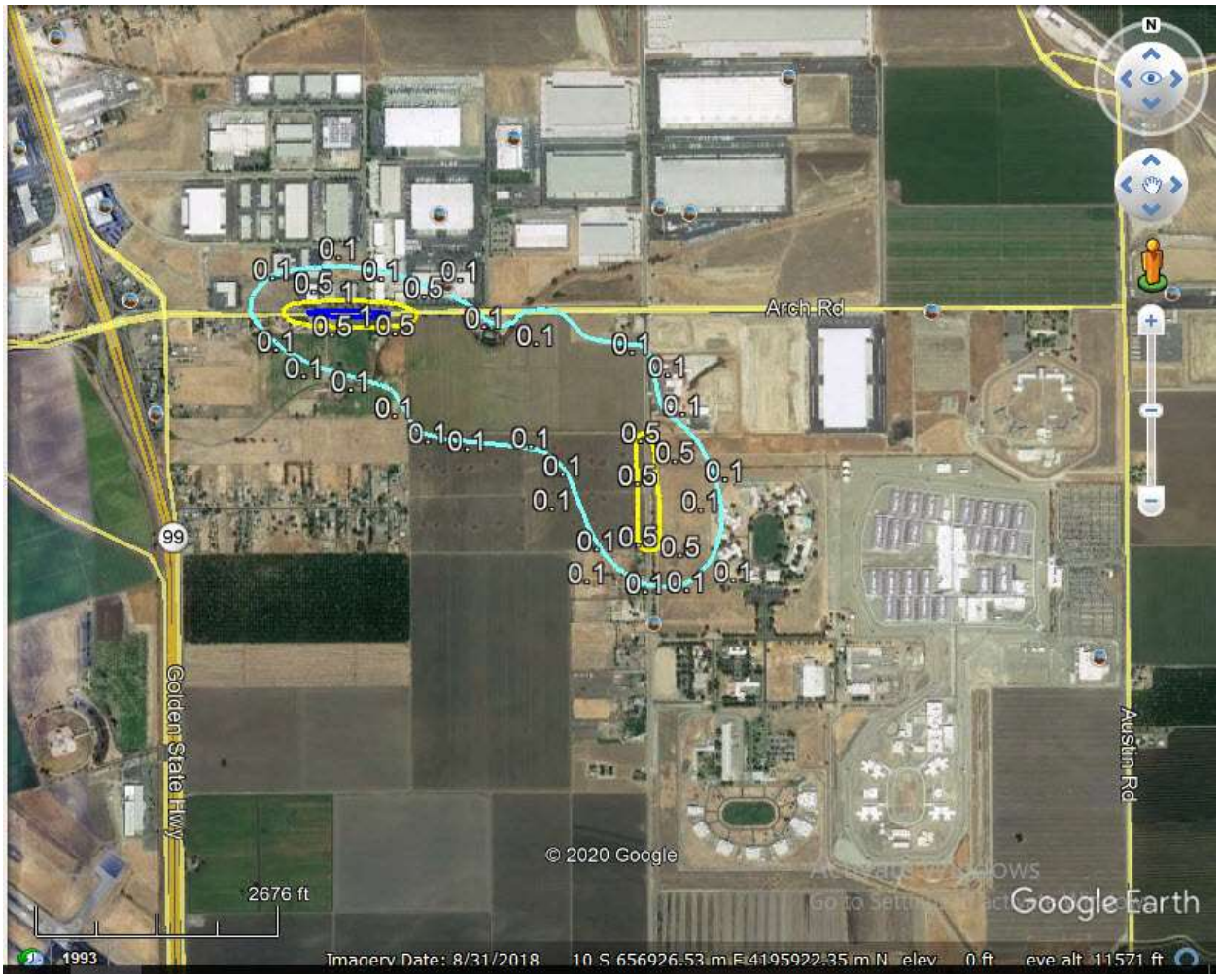


Figure 4-3
Spatial Variation of 40 Year Worker Cancer Risk per Million
Operational Phase



SECTION 5: RESULTS AND CONCLUSIONS

The results of the current analysis are summarized in Table 4-1. These results demonstrate that public health risks associated with the construction or operation of the proposed Archtown Industrial Project would not lead to significant public health risks. No that there are no chronic or acute recommended exposure levels for DPM, therefore, acute and chronic hazard indices were not calculated.

Table 4-1
Summary of Maximum Project Level Health Risks

Risk Metric	Construction Phase	Operational (Occupancy) Phase	Significance Threshold	Significant?
Maximum Residential Cancer Risk	3.93 (per million)	5.93 (per million)	20 (per million)	No
Maximum Worker Cancer Risk	Note 1.	0.5 (per million)	20 (per million)	No
Maximum Chronic Hazard Index	N/A	0.0148	1.0	No
Maximum Acute Hazard Index	N/A	0.006	1.0	No

Note 1. Worker risk was not evaluated for short-term exposure. Per OEHHA Guidance, worker exposure assumed 25 years minimum exposure.

The risk assessment process contains numerous, conservative assumption to ensure that public health risks are not underestimated. These assumptions are related to the exposure duration, toxicity data and use of Gaussian type statistical atmospheric dispersion models. For example, it is very unlikely any individual would remain at the same location for 70 years. As a result, this assumption substantially overstated the exposure and the health risks presented in this report. This is discussed in the next section.

SECTION 6: UNCERTAINTIES IN RISK EVALUATION

The HRA presented in this report contains numerous assumptions and uncertainties associated with estimates of emissions, dispersion modeling and risk characterization. The estimated risks in this HRA are based primarily on a series of conservative assumptions related to predicted environmental concentrations, exposure and chemical toxicity. As a result, the actual risks to nearby residents or workers would be 10 to 50 times lower than estimates presented in this report. These assumptions and uncertainties are discussed in this section

Emissions Estimates

For long-term risk evaluation, EPS used the DPM emissions assuming an aggregate fleet for 2023 heavy duty trucks. The HRA assumes that the emission rates will remain unchanged over the next 70 years. This substantially overstates the actual emissions over this period. As in the past, the emission rates of DPM will continue to declined. This decline will continue due to new regulations being considered as well as introduction of electric trucks.

Estimate of Exposure Concentration

The algorithms used in the AERMOD dispersion model tend to over-predict the actual concentration. According to the EPA[3], errors of +/- 10% to 40% are typical for the highest predicted concentrations due to limitations in the algorithms. As a result, the methodology used by EPS will overstate the actual concentration of DPM.

Exposure Assumptions

The 2015 OEHHA Guidelines assume that individuals spend 73% of the time at home. This is very conservative in that residents near the project site are likely to stay home every day for 70 years. This overestimate of exposure directly leads to an over estimate of cancer risk

[3] USEPA 2005: "Guidelines on Air Quality Models (Revised), 40 CFR 51, Appendix W. Available at: https://www.epa.gov/ttn/scram/guidance_permit.htm#appw

SECTION 7: REFERENCES

CalEPA (2012) "Technical Support Document for Exposure Assessment and Stochastic Analysis. Office of Environmental Health Hazard Assessment. California Environmental Protection Agency, August 2012.

CARB (2003) HARP User's Guide. Available at: http://www.arb.ca.gov/toxics/harp/harp.htm December 2003.

CARB (2004) Final Report to Research Division "Internal Combustion Engines (ICE) Air Toxics Emissions" Prepared by Zhu, Durbin, Norbeck and Cocker (July 2004).

EPA (2004) "User's Guide for the AMS/EPA Regulatory Model – AERMOD". EPA Document No. EPA=454/B-03-001 September 2004.

OEHHA (2014) Consolidated Table of Approved health Risk Values. Cal EPA, Office of Environmental Health Hazard Assessment. Available at: file:///C:/2014%20Feather%20River%20AQMD/Hollycross%20Cemetary/OEHHA%20contable.pdf. July 3, 2014.

HRA APPENDIX

HRA APPENDIX A

Construction and Operational Emissions

Archtown Industrial

San Joaquin County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Refrigerated Warehouse-No Rail	1,200.00	1000sqft	27.55	1,200,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.7	**Precipitation Freq (Days)**	51
Climate Zone	2			**Operational Year**	2023
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Grading - Actual area graded.

Construction Phase - No demolition.

Architectural Coating - Per SJVAPCD Rule 4601.

Consumer Products - Based on ARB factor with updated data.

Area Coating - Per SJVAPCD Rule 4601.

Operational Off-Road Equipment - Estimated number based on logistics site.

Land Use Change -

Construction Off-road Equipment Mitigation -

Mobile Land Use Mitigation -

Mobile Commute Mitigation -

Water Mitigation -

Waste Mitigation -

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	150.00	50.00
tblArchitecturalCoating	EF_Nonresidential_Interior	150.00	50.00
tblAreaCoating	Area_EF_Nonresidential_Exterior	150	50
tblAreaCoating	Area_EF_Nonresidential_Interior	150	50
tblConstructionPhase	NumDays	30.00	0.00
tblConstructionPhase	PhaseEndDate	5/12/2021	3/31/2021
tblConsumerProducts	ROG_EF	2.14E-05	1.25E-05
tblGrading	AcresOfGrading	112.50	67.00
tblOperationalOffRoadEquipment	OperLoadFactor	0.20	0.20
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	48.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

These Emissions Were Used to Calculate Risks for the Construction Phase

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.3605	3.4814	2.6513	7.9400e-003	0.6278	0.1184	0.7463	0.2526	0.1101	0.3626	0.0000	720.5436	720.5436	0.0993	0.0000	723.0272
2022	0.5246	4.7785	4.1873	0.0154	0.6911	0.1152	0.8063	0.1877	0.1085	0.2961	0.0000	1,405.9045	1,405.9045	0.1206	0.0000	1,408.9187
2023	2.9495	1.4114	1.5163	5.1000e-003	0.2235	0.0392	0.2626	0.0606	0.0367	0.0973	0.0000	464.4463	464.4463	0.0441	0.0000	465.5496
Maximum	**2.9495**	**4.7785**	**4.1873**	**0.0154**	**0.6911**	**0.1184**	**0.8063**	**0.2526**	**0.1101**	**0.3626**	**0.0000**	**1,405.9045**	**1,405.9045**	**0.1206**	**0.0000**	**1,408.9187**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.3605	3.4814	2.6513	7.9400e-003	0.4344	0.1184	0.5528	0.1549	0.1101	0.2649	0.0000	720.5432	720.5432	0.0993	0.0000	723.0269
2022	0.5246	4.7785	4.1873	0.0154	0.6911	0.1152	0.8063	0.1877	0.1085	0.2961	0.0000	1,405.9041	1,405.9041	0.1206	0.0000	1,408.9183
2023	2.9495	1.4114	1.5163	5.1000e-003	0.2235	0.0392	0.2626	0.0606	0.0367	0.0973	0.0000	464.4462	464.4462	0.0441	0.0000	465.5494
Maximum	**2.9495**	**4.7785**	**4.1873**	**0.0154**	**0.6911**	**0.1184**	**0.8063**	**0.1877**	**0.1101**	**0.2961**	**0.0000**	**1,405.9041**	**1,405.9041**	**0.1206**	**0.0000**	**1,408.9183**

Archtown Industrial - San Joaquin County, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**12.54**	**0.00**	**10.66**	**19.51**	**0.00**	**12.92**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**4-1-2021**	**6-30-2021**	0.8254	0.8254
2	**7-1-2021**	**9-30-2021**	1.5471	1.5471
3	**10-1-2021**	**12-31-2021**	1.4612	1.4612
4	**1-1-2022**	**3-31-2022**	1.3180	1.3180
5	**4-1-2022**	**6-30-2022**	1.3204	1.3204
6	**7-1-2022**	**9-30-2022**	1.3349	1.3349
7	**10-1-2022**	**12-31-2022**	1.3473	1.3473
8	**1-1-2023**	**3-31-2023**	1.1163	1.1163
9	**4-1-2023**	**6-30-2023**	1.7538	1.7538
10	**7-1-2023**	**9-30-2023**	1.4945	1.4945
		Highest	1.7538	1.7538

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	3.0166	1.0000e-004	0.0110	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0214	0.0214	6.0000e-005	0.0000	0.0229
Energy	7.3800e-003	0.0671	0.0563	4.0000e-004		5.1000e-003	5.1000e-003		5.1000e-003	5.1000e-003	0.0000	6,618.5097	6,618.5097	0.2974	0.0626	6,644.5908
Mobile	0.5576	3.5379	6.4540	0.0280	2.2114	0.0186	2.2301	0.5928	0.0174	0.6102	0.0000	2,580.4740	2,580.4740	0.1002	0.0000	2,582.9787
Offroad	0.6431	6.0183	7.1792	9.5800e-003		0.3719	0.3719		0.3421	0.3421	0.0000	842.1677	842.1677	0.2724	0.0000	848.9770
Waste						0.0000	0.0000		0.0000	0.0000	228.9738	0.0000	228.9738	13.5320	0.0000	567.2729
Water						0.0000	0.0000		0.0000	0.0000	88.0380	436.8188	524.8568	9.0621	0.2176	816.2527
Total	**4.2246**	**9.6234**	**13.7006**	**0.0380**	**2.2114**	**0.3957**	**2.6071**	**0.5928**	**0.3647**	**0.9575**	**317.0118**	**10,477.9917**	**10,795.0034**	**23.2640**	**0.2802**	**11,460.0949**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	3.0166	1.0000e-004	0.0110	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0214	0.0214	6.0000e-005	0.0000	0.0229
Energy	7.3800e-003	0.0671	0.0563	4.0000e-004		5.1000e-003	5.1000e-003		5.1000e-003	5.1000e-003	0.0000	6,618.5097	6,618.5097	0.2974	0.0626	6,644.5908
Mobile	0.5273	3.3072	5.7303	0.0243	1.8896	0.0162	1.9058	0.5065	0.0152	0.5217	0.0000	2,245.0098	2,245.0098	0.0919	0.0000	2,247.3064
Offroad	0.6431	6.0183	7.1792	9.5800e-003		0.3719	0.3719		0.3421	0.3421	0.0000	842.1677	842.1677	0.2724	0.0000	848.9770
Waste						0.0000	0.0000		0.0000	0.0000	57.2435	0.0000	57.2435	3.3830	0.0000	141.8182
Water						0.0000	0.0000		0.0000	0.0000	70.4304	349.4551	419.8854	7.2497	0.1741	653.0021
Total	**4.1943**	**9.3926**	**12.9769**	**0.0343**	**1.8896**	**0.3933**	**2.2829**	**0.5065**	**0.3624**	**0.8689**	**127.6738**	**10,055.1637**	**10,182.8375**	**11.2943**	**0.2367**	**10,535.7174**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.72**	**2.40**	**5.28**	**9.62**	**14.55**	**0.61**	**12.44**	**14.55**	**0.62**	**9.25**	**59.73**	**4.04**	**5.67**	**51.45**	**15.53**	**8.07**

2.3 Vegetation

Vegetation

	CO2e
Category	MT
Vegetation Land Change	-434.0000
Total	**-434.0000**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	4/1/2021	3/31/2021	5	0	
2	Site Preparation	Site Preparation	5/13/2021	6/9/2021	5	20	
3	Grading	Grading	6/10/2021	8/11/2021	5	45	
4	Building Construction	Building Construction	8/12/2021	4/19/2023	5	440	
5	Paving	Paving	4/20/2023	6/7/2023	5	35	
6	Architectural Coating	Architectural Coating	6/8/2023	7/26/2023	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 67

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 1,800,000; Non-Residential Outdoor: 600,000; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Demolition	Excavators	3	8.00	158	0.38
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Excavators	2	8.00	158	0.38
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Paving	Pavers	2	8.00	130	0.42
Paving	Rollers	2	8.00	80	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Grading	Graders	1	8.00	187	0.41
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Paving	Paving Equipment	2	8.00	132	0.36
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Building Construction	Welders	1	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	504.00	197.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	101.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7061
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7061**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.6000e-004	4.6000e-004	4.6300e-003	1.0000e-005	1.4300e-003	1.0000e-005	1.4400e-003	3.8000e-004	1.0000e-005	3.9000e-004	0.0000	1.2236	1.2236	3.0000e-005	0.0000	1.2243
Total	**6.6000e-004**	**4.6000e-004**	**4.6300e-003**	**1.0000e-005**	**1.4300e-003**	**1.0000e-005**	**1.4400e-003**	**3.8000e-004**	**1.0000e-005**	**3.9000e-004**	**0.0000**	**1.2236**	**1.2236**	**3.0000e-005**	**0.0000**	**1.2243**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0813	0.0000	0.0813	0.0447	0.0000	0.0447	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7060
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.0813**	**0.0204**	**0.1017**	**0.0447**	**0.0188**	**0.0635**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7060**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.6000e-004	4.6000e-004	4.6300e-003	1.0000e-005	1.4300e-003	1.0000e-005	1.4400e-003	3.8000e-004	1.0000e-005	3.9000e-004	0.0000	1.2236	1.2236	3.0000e-005	0.0000	1.2243
Total	**6.6000e-004**	**4.6000e-004**	**4.6300e-003**	**1.0000e-005**	**1.4300e-003**	**1.0000e-005**	**1.4400e-003**	**3.8000e-004**	**1.0000e-005**	**3.9000e-004**	**0.0000**	**1.2236**	**1.2236**	**3.0000e-005**	**0.0000**	**1.2243**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1710	0.0000	0.1710	0.0783	0.0000	0.0783	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0943	1.0440	0.6948	1.4000e-003		0.0447	0.0447		0.0411	0.0411	0.0000	122.6137	122.6137	0.0397	0.0000	123.6051
Total	**0.0943**	**1.0440**	**0.6948**	**1.4000e-003**	**0.1710**	**0.0447**	**0.2157**	**0.0783**	**0.0411**	**0.1194**	**0.0000**	**122.6137**	**122.6137**	**0.0397**	**0.0000**	**123.6051**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6600e-003	1.1500e-003	0.0116	3.0000e-005	3.5800e-003	2.0000e-005	3.6100e-003	9.5000e-004	2.0000e-005	9.7000e-004	0.0000	3.0589	3.0589	8.0000e-005	0.0000	3.0609
Total	**1.6600e-003**	**1.1500e-003**	**0.0116**	**3.0000e-005**	**3.5800e-003**	**2.0000e-005**	**3.6100e-003**	**9.5000e-004**	**2.0000e-005**	**9.7000e-004**	**0.0000**	**3.0589**	**3.0589**	**8.0000e-005**	**0.0000**	**3.0609**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0770	0.0000	0.0770	0.0352	0.0000	0.0352	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0943	1.0440	0.6948	1.4000e-003		0.0447	0.0447		0.0411	0.0411	0.0000	122.6136	122.6136	0.0397	0.0000	123.6050
Total	**0.0943**	**1.0440**	**0.6948**	**1.4000e-003**	**0.0770**	**0.0447**	**0.1216**	**0.0352**	**0.0411**	**0.0763**	**0.0000**	**122.6136**	**122.6136**	**0.0397**	**0.0000**	**123.6050**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6600e-003	1.1500e-003	0.0116	3.0000e-005	3.5800e-003	2.0000e-005	3.6100e-003	9.5000e-004	2.0000e-005	9.7000e-004	0.0000	3.0589	3.0589	8.0000e-005	0.0000	3.0609
Total	**1.6600e-003**	**1.1500e-003**	**0.0116**	**3.0000e-005**	**3.5800e-003**	**2.0000e-005**	**3.6100e-003**	**9.5000e-004**	**2.0000e-005**	**9.7000e-004**	**0.0000**	**3.0589**	**3.0589**	**8.0000e-005**	**0.0000**	**3.0609**

3.5 Building Construction - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0970	0.8890	0.8453	1.3700e-003		0.0489	0.0489		0.0460	0.0460	0.0000	118.1350	118.1350	0.0285	0.0000	118.8475
Total	**0.0970**	**0.8890**	**0.8453**	**1.3700e-003**		**0.0489**	**0.0489**		**0.0460**	**0.0460**	**0.0000**	**118.1350**	**118.1350**	**0.0285**	**0.0000**	**118.8475**

3.5 Building Construction - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0333	1.0762	0.2219	2.8100e-003	0.0664	3.0600e-003	0.0694	0.0192	2.9300e-003	0.0221	0.0000	267.3526	267.3526	0.0158	0.0000	267.7477
Worker	0.0947	0.0656	0.6616	1.9300e-003	0.2047	1.3400e-003	0.2061	0.0544	1.2400e-003	0.0557	0.0000	174.7241	174.7241	4.4600e-003	0.0000	174.8356
Total	**0.1280**	**1.1417**	**0.8835**	**4.7400e-003**	**0.2711**	**4.4000e-003**	**0.2755**	**0.0736**	**4.1700e-003**	**0.0778**	**0.0000**	**442.0767**	**442.0767**	**0.0203**	**0.0000**	**442.5833**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0970	0.8890	0.8453	1.3700e-003		0.0489	0.0489		0.0460	0.0460	0.0000	118.1349	118.1349	0.0285	0.0000	118.8474
Total	**0.0970**	**0.8890**	**0.8453**	**1.3700e-003**		**0.0489**	**0.0489**		**0.0460**	**0.0460**	**0.0000**	**118.1349**	**118.1349**	**0.0285**	**0.0000**	**118.8474**

3.5 Building Construction - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0333	1.0762	0.2219	2.8100e-003	0.0664	3.0600e-003	0.0694	0.0192	2.9300e-003	0.0221	0.0000	267.3526	267.3526	0.0158	0.0000	267.7477
Worker	0.0947	0.0656	0.6616	1.9300e-003	0.2047	1.3400e-003	0.2061	0.0544	1.2400e-003	0.0557	0.0000	174.7241	174.7241	4.4600e-003	0.0000	174.8356
Total	**0.1280**	**1.1417**	**0.8835**	**4.7400e-003**	**0.2711**	**4.4000e-003**	**0.2755**	**0.0736**	**4.1700e-003**	**0.0778**	**0.0000**	**442.0767**	**442.0767**	**0.0203**	**0.0000**	**442.5833**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2218	2.0300	2.1272	3.5000e-003		0.1052	0.1052		0.0990	0.0990	0.0000	301.2428	301.2428	0.0722	0.0000	303.0471
Total	**0.2218**	**2.0300**	**2.1272**	**3.5000e-003**		**0.1052**	**0.1052**		**0.0990**	**0.0990**	**0.0000**	**301.2428**	**301.2428**	**0.0722**	**0.0000**	**303.0471**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0788	2.5989	0.5217	7.1100e-003	0.1692	6.7500e-003	0.1760	0.0489	6.4600e-003	0.0554	0.0000	675.1202	675.1202	0.0382	0.0000	676.0758
Worker	0.2240	0.1495	1.5384	4.7500e-003	0.5219	3.3200e-003	0.5252	0.1388	3.0600e-003	0.1418	0.0000	429.5414	429.5414	0.0102	0.0000	429.7958
Total	**0.3028**	**2.7484**	**2.0601**	**0.0119**	**0.6911**	**0.0101**	**0.7012**	**0.1877**	**9.5200e-003**	**0.1972**	**0.0000**	**1,104.6616**	**1,104.6616**	**0.0484**	**0.0000**	**1,105.8717**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2218	2.0300	2.1272	3.5000e-003		0.1052	0.1052		0.0990	0.0990	0.0000	301.2425	301.2425	0.0722	0.0000	303.0467
Total	**0.2218**	**2.0300**	**2.1272**	**3.5000e-003**		**0.1052**	**0.1052**		**0.0990**	**0.0990**	**0.0000**	**301.2425**	**301.2425**	**0.0722**	**0.0000**	**303.0467**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0788	2.5989	0.5217	7.1100e-003	0.1692	6.7500e-003	0.1760	0.0489	6.4600e-003	0.0554	0.0000	675.1202	675.1202	0.0382	0.0000	676.0758
Worker	0.2240	0.1495	1.5384	4.7500e-003	0.5219	3.3200e-003	0.5252	0.1388	3.0600e-003	0.1418	0.0000	429.5414	429.5414	0.0102	0.0000	429.7958
Total	**0.3028**	**2.7484**	**2.0601**	**0.0119**	**0.6911**	**0.0101**	**0.7012**	**0.1877**	**9.5200e-003**	**0.1972**	**0.0000**	**1,104.6616**	**1,104.6616**	**0.0484**	**0.0000**	**1,105.8717**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0613	0.5610	0.6335	1.0500e-003		0.0273	0.0273		0.0257	0.0257	0.0000	90.4039	90.4039	0.0215	0.0000	90.9415
Total	**0.0613**	**0.5610**	**0.6335**	**1.0500e-003**		**0.0273**	**0.0273**		**0.0257**	**0.0257**	**0.0000**	**90.4039**	**90.4039**	**0.0215**	**0.0000**	**90.9415**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0168	0.6049	0.1318	2.0800e-003	0.0508	6.2000e-004	0.0514	0.0147	5.9000e-004	0.0153	0.0000	197.6474	197.6474	8.0200e-003	0.0000	197.8478
Worker	0.0625	0.0402	0.4206	1.3700e-003	0.1566	9.7000e-004	0.1575	0.0416	8.9000e-004	0.0425	0.0000	124.0667	124.0667	2.7300e-003	0.0000	124.1348
Total	**0.0793**	**0.6451**	**0.5524**	**3.4500e-003**	**0.2073**	**1.5900e-003**	**0.2089**	**0.0563**	**1.4800e-003**	**0.0578**	**0.0000**	**321.7141**	**321.7141**	**0.0108**	**0.0000**	**321.9826**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0613	0.5610	0.6335	1.0500e-003		0.0273	0.0273		0.0257	0.0257	0.0000	90.4037	90.4037	0.0215	0.0000	90.9414
Total	**0.0613**	**0.5610**	**0.6335**	**1.0500e-003**		**0.0273**	**0.0273**		**0.0257**	**0.0257**	**0.0000**	**90.4037**	**90.4037**	**0.0215**	**0.0000**	**90.9414**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0168	0.6049	0.1318	2.0800e-003	0.0508	6.2000e-004	0.0514	0.0147	5.9000e-004	0.0153	0.0000	197.6474	197.6474	8.0200e-003	0.0000	197.8478
Worker	0.0625	0.0402	0.4206	1.3700e-003	0.1566	9.7000e-004	0.1575	0.0416	8.9000e-004	0.0425	0.0000	124.0667	124.0667	2.7300e-003	0.0000	124.1348
Total	**0.0793**	**0.6451**	**0.5524**	**3.4500e-003**	**0.2073**	**1.5900e-003**	**0.2089**	**0.0563**	**1.4800e-003**	**0.0578**	**0.0000**	**321.7141**	**321.7141**	**0.0108**	**0.0000**	**321.9826**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0181	0.1784	0.2552	4.0000e-004		8.9300e-003	8.9300e-003		8.2100e-003	8.2100e-003	0.0000	35.0470	35.0470	0.0113	0.0000	35.3304
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0181**	**0.1784**	**0.2552**	**4.0000e-004**		**8.9300e-003**	**8.9300e-003**		**8.2100e-003**	**8.2100e-003**	**0.0000**	**35.0470**	**35.0470**	**0.0113**	**0.0000**	**35.3304**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.3000e-004	5.4000e-004	5.6200e-003	2.0000e-005	2.0900e-003	1.0000e-005	2.1000e-003	5.6000e-004	1.0000e-005	5.7000e-004	0.0000	1.6569	1.6569	4.0000e-005	0.0000	1.6578
Total	**8.3000e-004**	**5.4000e-004**	**5.6200e-003**	**2.0000e-005**	**2.0900e-003**	**1.0000e-005**	**2.1000e-003**	**5.6000e-004**	**1.0000e-005**	**5.7000e-004**	**0.0000**	**1.6569**	**1.6569**	**4.0000e-005**	**0.0000**	**1.6578**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0181	0.1784	0.2552	4.0000e-004		8.9300e-003	8.9300e-003		8.2100e-003	8.2100e-003	0.0000	35.0470	35.0470	0.0113	0.0000	35.3304
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0181**	**0.1784**	**0.2552**	**4.0000e-004**		**8.9300e-003**	**8.9300e-003**		**8.2100e-003**	**8.2100e-003**	**0.0000**	**35.0470**	**35.0470**	**0.0113**	**0.0000**	**35.3304**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.3000e-004	5.4000e-004	5.6200e-003	2.0000e-005	2.0900e-003	1.0000e-005	2.1000e-003	5.6000e-004	1.0000e-005	5.7000e-004	0.0000	1.6569	1.6569	4.0000e-005	0.0000	1.6578
Total	**8.3000e-004**	**5.4000e-004**	**5.6200e-003**	**2.0000e-005**	**2.0900e-003**	**1.0000e-005**	**2.1000e-003**	**5.6000e-004**	**1.0000e-005**	**5.7000e-004**	**0.0000**	**1.6569**	**1.6569**	**4.0000e-005**	**0.0000**	**1.6578**

3.7 Architectural Coating - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	2.7810					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.3500e-003	0.0228	0.0317	5.0000e-005		1.2400e-003	1.2400e-003		1.2400e-003	1.2400e-003	0.0000	4.4682	4.4682	2.7000e-004	0.0000	4.4749
Total	**2.7844**	**0.0228**	**0.0317**	**5.0000e-005**		**1.2400e-003**	**1.2400e-003**		**1.2400e-003**	**1.2400e-003**	**0.0000**	**4.4682**	**4.4682**	**2.7000e-004**	**0.0000**	**4.4749**

3.7 Architectural Coating - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.6200e-003	3.6100e-003	0.0378	1.2000e-004	0.0141	9.0000e-005	0.0142	3.7400e-003	8.0000e-005	3.8200e-003	0.0000	11.1563	11.1563	2.5000e-004	0.0000	11.1624
Total	**5.6200e-003**	**3.6100e-003**	**0.0378**	**1.2000e-004**	**0.0141**	**9.0000e-005**	**0.0142**	**3.7400e-003**	**8.0000e-005**	**3.8200e-003**	**0.0000**	**11.1563**	**11.1563**	**2.5000e-004**	**0.0000**	**11.1624**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	2.7810					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.3500e-003	0.0228	0.0317	5.0000e-005		1.2400e-003	1.2400e-003		1.2400e-003	1.2400e-003	0.0000	4.4682	4.4682	2.7000e-004	0.0000	4.4749
Total	**2.7844**	**0.0228**	**0.0317**	**5.0000e-005**		**1.2400e-003**	**1.2400e-003**		**1.2400e-003**	**1.2400e-003**	**0.0000**	**4.4682**	**4.4682**	**2.7000e-004**	**0.0000**	**4.4749**

3.7 Architectural Coating - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.6200e-003	3.6100e-003	0.0378	1.2000e-004	0.0141	9.0000e-005	0.0142	3.7400e-003	8.0000e-005	3.8200e-003	0.0000	11.1563	11.1563	2.5000e-004	0.0000	11.1624
Total	**5.6200e-003**	**3.6100e-003**	**0.0378**	**1.2000e-004**	**0.0141**	**9.0000e-005**	**0.0142**	**3.7400e-003**	**8.0000e-005**	**3.8200e-003**	**0.0000**	**11.1563**	**11.1563**	**2.5000e-004**	**0.0000**	**11.1624**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Improve Pedestrian Network

Implement Trip Reduction Program

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.5273	3.3072	5.7303	0.0243	1.8896	0.0162	1.9058	0.5065	0.0152	0.5217	0.0000	2,245.0098	2,245.0098	0.0919	0.0000	2,247.3064
Unmitigated	0.5576	3.5379	6.4540	0.0280	2.2114	0.0186	2.2301	0.5928	0.0174	0.6102	0.0000	2,580.4740	2,580.4740	0.1002	0.0000	2,582.9787

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Refrigerated Warehouse-No Rail	2,016.00	2,016.00	2016.00	5,885,734	5,029,217
Total	2,016.00	2,016.00	2,016.00	5,885,734	5,029,217

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Refrigerated Warehouse-No	9.50	7.30	7.30	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Refrigerated Warehouse-No Rail	0.561380	0.034626	0.184829	0.116141	0.016642	0.004535	0.016185	0.056706	0.001192	0.001407	0.004983	0.000606	0.000767

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	6,545.5080	6,545.5080	0.2960	0.0612	6,571.1552
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	6,545.5080	6,545.5080	0.2960	0.0612	6,571.1552
NaturalGas Mitigated	7.3800e-003	0.0671	0.0563	4.0000e-004		5.1000e-003	5.1000e-003		5.1000e-003	5.1000e-003	0.0000	73.0017	73.0017	1.4000e-003	1.3400e-003	73.4355
NaturalGas Unmitigated	7.3800e-003	0.0671	0.0563	4.0000e-004		5.1000e-003	5.1000e-003		5.1000e-003	5.1000e-003	0.0000	73.0017	73.0017	1.4000e-003	1.3400e-003	73.4355

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Refrigerated Warehouse-No Rail	1.368e+006	7.3800e-003	0.0671	0.0563	4.0000e-004		5.1000e-003	5.1000e-003		5.1000e-003	5.1000e-003	0.0000	73.0017	73.0017	1.4000e-003	1.3400e-003	73.4355
Total		**7.3800e-003**	**0.0671**	**0.0563**	**4.0000e-004**		**5.1000e-003**	**5.1000e-003**		**5.1000e-003**	**5.1000e-003**	**0.0000**	**73.0017**	**73.0017**	**1.4000e-003**	**1.3400e-003**	**73.4355**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Refrigerated Warehouse-No Rail	1.368e+006	7.3800e-003	0.0671	0.0563	4.0000e-004		5.1000e-003	5.1000e-003		5.1000e-003	5.1000e-003	0.0000	73.0017	73.0017	1.4000e-003	1.3400e-003	73.4355
Total		**7.3800e-003**	**0.0671**	**0.0563**	**4.0000e-004**		**5.1000e-003**	**5.1000e-003**		**5.1000e-003**	**5.1000e-003**	**0.0000**	**73.0017**	**73.0017**	**1.4000e-003**	**1.3400e-003**	**73.4355**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Refrigerated Warehouse-No Rail	2.25e+007	6,545.5080	0.2960	0.0612	6,571.1552
Total		**6,545.5080**	**0.2960**	**0.0612**	**6,571.1552**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Refrigerated Warehouse-No Rail	2.25e+007	6,545.5080	0.2960	0.0612	6,571.1552
Total		**6,545.5080**	**0.2960**	**0.0612**	**6,571.1552**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	3.0166	1.0000e-004	0.0110	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0214	0.0214	6.0000e-005	0.0000	0.0229
Unmitigated	3.0166	1.0000e-004	0.0110	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0214	0.0214	6.0000e-005	0.0000	0.0229

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.2781					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.7375					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0200e-003	1.0000e-004	0.0110	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0214	0.0214	6.0000e-005	0.0000	0.0229
Total	**3.0166**	**1.0000e-004**	**0.0110**	**0.0000**		**4.0000e-005**	**4.0000e-005**		**4.0000e-005**	**4.0000e-005**	**0.0000**	**0.0214**	**0.0214**	**6.0000e-005**	**0.0000**	**0.0229**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.2781					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.7375					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0200e-003	1.0000e-004	0.0110	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0214	0.0214	6.0000e-005	0.0000	0.0229
Total	**3.0166**	**1.0000e-004**	**0.0110**	**0.0000**		**4.0000e-005**	**4.0000e-005**		**4.0000e-005**	**4.0000e-005**	**0.0000**	**0.0214**	**0.0214**	**6.0000e-005**	**0.0000**	**0.0229**

7.0 Water Detail

7.1 Mitigation Measures Water

Apply Water Conservation Strategy

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	419.8854	7.2497	0.1741	653.0021
Unmitigated	524.8568	9.0621	0.2176	816.2527

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Refrigerated Warehouse-No Rail	277.5 / 0	524.8568	9.0621	0.2176	816.2527
Total		**524.8568**	**9.0621**	**0.2176**	**816.2527**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Refrigerated Warehouse-No Rail	222 / 0	419.8854	7.2497	0.1741	653.0021
Total		**419.8854**	**7.2497**	**0.1741**	**653.0021**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	57.2435	3.3830	0.0000	141.8182
Unmitigated	228.9738	13.5320	0.0000	567.2729

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Refrigerated Warehouse-No Rail	1128	228.9738	13.5320	0.0000	567.2729
Total		**228.9738**	**13.5320**	**0.0000**	**567.2729**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Refrigerated Warehouse-No Rail	282	57.2435	3.3830	0.0000	141.8182
Total		**57.2435**	**3.3830**	**0.0000**	**141.8182**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Forklifts	48	8.00	260	89	0.20	Diesel

UnMitigated/Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	tons/yr										MT/yr					
Forklifts	0.6431	6.0183	7.1792	9.5800e-003		0.3719	0.3719		0.3421	0.3421	0.0000	842.1677	842.1677	0.2724	0.0000	848.9770
Total	**0.6431**	**6.0183**	**7.1792**	**9.5800e-003**		**0.3719**	**0.3719**		**0.3421**	**0.3421**	**0.0000**	**842.1677**	**842.1677**	**0.2724**	**0.0000**	**848.9770**

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

	Total CO2	CH4	N2O	CO2e
Category	MT			
Unmitigated	-434.0000	0.0000	0.0000	-434.0000

11.1 Vegetation Land Change

Vegetation Type

	Initial/Final	Total CO2	CH4	N2O	CO2e
	Acres	MT			
Cropland	70 / 0	-434.0000	0.0000	0.0000	-434.0000
Total		**-434.0000**	**0.0000**	**0.0000**	**-434.0000**

HRA APPENDIX B

Traffic Data

Traffic Data

EPS reviewed the May 2009 traffic study completed by Fehr & Pers that projected 4,790 trips per days. This study, however, was for a larger project and is not applicable to the current project. The current project is limited to 1,200,000 square feet and the estimated traffic volumes estimated by BaseCamp are as follows:

Daily Average Traffic Volume:	2,016 vehicles per day, 365 days per year
Percent HD Trucks:	25%
Percent Autos and Light-Duty trucks:	75%

HRA APPENDIX C

Detailed Emission Calculations

Table C-1
Calculation of On-Site DPM Emissions

IDLING EMISSIONS	Units	
Total Daily Traffic		2016
% Trucks		25%
HD Trucks Count	*(trucks/day)*	504
Truck Idling		
Idle rate/truck	*(min/truck)*	15
Idle rate all trucks	*(min/day)*	7,560
Idle time/day all trucks	*(hrs/day)*	126.0
idle time/yr all trucks	*(hrs/yr)*	45,990.0
Emission Factor for Vehicle Idling (Note 1)	*(grams/vehicle-day)*	0.027361
Idling Emissions All Trucks	*(grams/yr)*	1,258.3
	(lbs/yr)	2.77

EMISSIONS FROM On-Site Truck Movement	Units	
Daily Truck Volume	(Trucks/day)	504
Distrance Travelled On-Site		
1 Truck	*(mile/truck)*	0.10
All Trucks/day	*(miles/day)*	50.40
All Trucks (per year)	*(miles/yr)*	18,396
Emission Factor (EMFAC 2017 for HD Trucks CY 2022)	*(gram/mile)*	0.02098
Emissions		
1 Truck (per mile)	*(grams/mile)*	0.02098
All Trucks (per day)	*(grams/day)*	1.05719
All Trucks (per year)	*(grams/yr)*	385.87
	(lbs/yr)	0.850

EMISSIONS FROM TRUs	Units	
No. of Trucks (25% of all HD Trucks)	*(trucks with TRUs/day)*	126.0
TRU Operating Time		
1 TRU	*(min)*	15
All TRUs	*(hrs/day)*	31.5
Average TRU Engine Size	*(hp)*	25
Emission Factor for TRUs (Note 2)	*(grams/hp-hr)*	0.03
Load Factor (Note 3)		0.46
Emission Rate		
1 Truck (engine HP x EF x Load Factor)	*(grams/hr)*	0.35
All Trucks (x daily operating hrs for all trucks)	*(grams/day)*	10.87
(x365)	*(grams/yr)*	3,966.6
(1 lb/454 grams)	*(lbs/yr)*	8.74
TOTAL On-Site (Idling +On-Site Move't+TRUs)	*(lbs/yr)*	12.36

Notes
1. Available at: https://ww3.arb.ca.gov/msei/emfac2011_idling_emission_rates.xlsx
2. Emission Factor from ARB: https://ww3.arb.ca.gov/regact/trude03/fro1.pdf

3. Draft 2019 Update to Emissions Inventory for Transport Refrigeration Units. California Air Resources Board October 2019. Section 3.6, Table 9.

Table C-2
Calculation of DPM Emissions from
Truck Travel within 0.25 Miles of Project

Emissions from Trucks		West Along Arch Road	South Along Newcastle Rd
Annual Vehicle Count	(truck trips/day)	504	504
	(truck trips/yr)	183,960	183,960
Emission Factor for Vehicle Movement (Note 1)	(grams/mile)	0.0256	0.0256
Distance Travelled			
1 Truck Trip	(mile/truck trip)	0.25	0.25
All Truck Trips	(total miles/yr)	45,990	45,990
Emissions of DPM	(grams/yr)	1,177	1,177
	(lbs/yr)	2.59	2.59

Notes:
1. Emissions based on EMFAC 2017 for CY 2023 aggregate speed and model years for HD Trucks

Table C-3
Calculation of Toxic Emissions from Automobile Traffic within 0.25 mile of Project Site

No. of Vehicles per Day	1,512	veh/day total
	551,880	veh/yr total
	275,940	veh/yr per 0.25 mile segment
Length of Roadway	0.25	mile
Annual Miles per Roadway Segment	68,985	miles/yr per 0.25 mile segment

	EF	Emission Rate (Vehicle Travel)			Emission Rate (vehicle travel + idle + start-up/shut down)
TAC	(mg/mile)	(mg/yr)	(g/yr)	(lb/yr)	(lb/yr)
1,3 Butadiene	4.48	309,053	309.053	0.681	1.0211
Benzene	45.28	3,123,641	3123.641	6.880	13.7605
Formaldehyde	12.87	887,837	887.837	1.956	3.9112
Acetaldehyde	2.77	191,088	191.088	0.421	0.8418

NOTES

1. Emission Factors From: Zhu, Durbin, Norbeck and Cocker (July 2004)
"Internal Combustion Engine (ICE) Air Toxic Emissions"
Final Report to Research Division CARB, Sacramento, CA

2. Traffic volume based on estimates in ITE Trip Generation Rates (10th Ed) for Land Use 945 "Gasoline/Service Station with Convenience Market"

3. Emissions from Vehicle Idle + start-up and shut-down estimated to equal 50% of emissions from vehicle travel

File: Archtown
Sheet: C-3 Auto Travel

Table C-4
Summary of Emissions

	On-Site	Off-Site[1]			
	HD Truck Idle, TRUs, etc.	HD Trucks	Autos + Light Duty Trucks		
Daily Trips	504	504	1,512		2016
Pollutant					Total
DPM	12.36	2.59	0		14.95
1,3 Butadiene			1.02		1.02
Acetaldehyde			0.84		0.84
Benzene			13.76		13.76
Formaldehyde			3.91		3.91

Note 1: These emissions are for each 1/4 mile segment shown in Figure 2-1.

HRA APPENDIX D

Excerpts of AERMOD Model Reports

```
**
**************************************
**
** AERMOD Input Produced by:
** AERMOD View Ver. 9.8.3
** Lakes Environmental Software Inc.
** Date: 7/24/2020
** File: C:\Lakes\AERMOD View\ARCHTWN2\ARCHTWN2.ADI
**
**************************************
**
**
**************************************
** AERMOD Control Pathway
**************************************
**
**
CO STARTING
   TITLEONE C:\Lakes\AERMOD View\ARCHTWN2\ARCHTWN2.isc
   TITLETWO Archtown Industrial Park Operational Run for Export to HARP2
   MODELOPT CONC FLAT ELEV
   AVERTIME 1 PERIOD
   POLLUTID DPM
   FLAGPOLE 1.50
   RUNORNOT RUN
   ERRORFIL ARCHTWN2.err
CO FINISHED
**
**************************************
** AERMOD Source Pathway
**************************************
**
**
SO STARTING
** Source Location **
** Source ID - Type - X Coord. - Y Coord. **
   LOCATION PAREA1       AREAPOLY   657785.108  4196830.588       10.670
** DESCRSRC Revised Site Footprint
   LOCATION ALINE1       LINE       656818.653  4196799.392   657243.072  4196816.201        9.450
** DESCRSRC Arch Rd 1/4 Mile Segment Going West
   LOCATION ALINE2       LINE       658045.686  4196425.399   658066.697  4195996.778       10.970
** DESCRSRC Along Newcastle Rd
** Source Parameters **
   SRCPARAM PAREA1        3.51E-06     3.048        16
   AREAVERT PAREA1       657785.108 4196830.588 657790.680 4196709.398
   AREAVERT PAREA1       658005.200 4196714.970 658003.807 4196831.981
   AREAVERT PAREA1       658052.561 4196829.195 658051.168 4196428.015
   AREAVERT PAREA1       657248.809 4196411.299 657240.451 4196816.658
   AREAVERT PAREA1       657431.290 4196820.837 657471.687 4196735.865
   AREAVERT PAREA1       657499.546 4196706.612 657537.157 4196696.861
   AREAVERT PAREA1       657570.589 4196705.219 657599.841 4196745.616
   AREAVERT PAREA1       657623.522 4196798.549 657623.522 4196826.409
   SRCPARAM ALINE1        0.000259     3.048     9.144
   SRCPARAM ALINE2        0.000255     3.048     9.144

** Variable Emissions Type: "By Hour-of-Day (HROFDY)"
** Variable Emission Scenario: "Scenario 1"
   EMISFACT PAREA1       HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT PAREA1       HROFDY 1.0 1.0 1.0 1.0 1.0 1.0
```

```
   EMISFACT PAREA1       HROFDY 1.0 1.0 1.0 1.0 1.0 0.0
   EMISFACT PAREA1       HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   SRCGROUP PAREA1   PAREA1
   SRCGROUP ALINE1   ALINE1
   SRCGROUP ALINE2   ALINE2
   SRCGROUP ALL
SO FINISHED
**
**************************************
** AERMOD Receptor Pathway
**************************************
**
**
RE STARTING
   INCLUDED ARCHTWN2.rou
RE FINISHED
**
**************************************
** AERMOD Meteorology Pathway
**************************************
**
**
ME STARTING
   SURFFILE ..\hoggan2\Stockton_2013-2017.SFC
   PROFFILE ..\hoggan2\Stockton_2013-2017.PFL
   SURFDATA 23237 2013
   UAIRDATA 23230 2013 OAKLAND/WSO_AP
   PROFBASE 8.0 METERS
ME FINISHED
**
**************************************
** AERMOD Output Pathway
**************************************
**
**
OU STARTING
   RECTABLE ALLAVE 1ST
   RECTABLE 1 1ST
** Auto-Generated Plotfiles
   PLOTFILE 1 ALL 1ST ARCHTWN2.AD\01H1GALL.PLT 31
   PLOTFILE 1 PAREA1 1ST ARCHTWN2.AD\01H1G001.PLT 32
   PLOTFILE 1 ALINE1 1ST ARCHTWN2.AD\01H1G002.PLT 33
   PLOTFILE 1 ALINE2 1ST ARCHTWN2.AD\01H1G003.PLT 34
   PLOTFILE PERIOD ALL ARCHTWN2.AD\PE00GALL.PLT 35
   PLOTFILE PERIOD PAREA1 ARCHTWN2.AD\PE00G001.PLT 36
   PLOTFILE PERIOD ALINE1 ARCHTWN2.AD\PE00G002.PLT 37
   PLOTFILE PERIOD ALINE2 ARCHTWN2.AD\PE00G003.PLT 38
   SUMMFILE ARCHTWN2.sum
OU FINISHED


  *** Message Summary For AERMOD Model Setup ***

  --------- Summary of Total Messages --------

 A Total of            0 Fatal Error Message(s)
 A Total of            3 Warning Message(s)
 A Total of            0 Informational Message(s)
```

```
   ******** FATAL ERROR MESSAGES ********
              ***  NONE  ***


   ********   WARNING MESSAGES   ********
RE W213    1364       RECART: ELEV Input Inconsistent With Option: Input Ignored       UCART1
ME W186      88       MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used          0.50
ME W187      88       MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET

**********************************
*** SETUP Finishes Successfully ***
**********************************
```

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

                                        ***   MODEL SETUP OPTIONS SUMMARY   ***
- -

**Model Is Setup For Calculation of Average CONCentration Values.

  -- DEPOSITION LOGIC --
**NO GAS DEPOSITION Data Provided.
**NO PARTICLE DEPOSITION Data Provided.
**Model Uses NO DRY DEPLETION. DRYDPLT = F
**Model Uses NO WET DEPLETION. WETDPLT = F

**Model Uses RURAL Dispersion Only.

**Model Allows User-Specified Options:
        1. Stack-tip Downwash.
        2. Allow FLAT/ELEV Terrain Option by Source,
           with   0 FLAT and   3 ELEV Source(s).
        3. Use Calms Processing Routine.
        4. Use Missing Data Processing Routine.
        5. No Exponential Decay.

**Other Options Specified:
        ADJ_U*   - Use ADJ_U* option for SBL in AERMET
        CCVR_Sub - Meteorological data includes CCVR substitutions
        TEMP_Sub - Meteorological data includes TEMP substitutions

**Model Accepts FLAGPOLE Receptor Heights.

**The User Specified a Pollutant Type of: DPM

**Model Calculates 1 Short Term Average(s) of: 1-HR
    and Calculates PERIOD Averages

**This Run Includes: 3 Source(s);   4 Source Group(s); and   2976 Receptor(s)

               with: 0 POINT(s), including
                          0 POINTCAP(s) and   0 POINTHOR(s)
                and: 0 VOLUME source(s)
                and: 1 AREA type source(s)
                and: 2 LINE source(s)
                and: 0 RLINE/RLINEXT source(s)
                and: 0 OPENPIT source(s)
                and: 0 BUOYANT LINE source(s) with   0 line(s)

**Model Set To Continue RUNning After the Setup Testing.

**The AERMET Input Meteorological Data Version Date: 18081

**Output Options Selected:
         Model Outputs Tables of PERIOD Averages by Receptor
         Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE Keyword)
         Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)
         Model Outputs Separate Summary File of High Ranked Values (SUMMFILE Keyword)

```
**NOTE:  The Following Flags May Appear Following CONC Values:  c for Calm Hours
                                                                m for Missing Hours
                                                                b for Both Calm and Missing Hours

**Misc. Inputs:  Base Elev. for Pot. Temp. Profile (m MSL) =     8.00 ;  Decay Coef. =    0.000     ;  Rot. Angle =     0.0
                 Emission Units = GRAMS/SEC                             ;  Emission Rate Unit Factor =   0.10000E+07
                 Output Units   = MICROGRAMS/M**3

**Approximate Storage Requirements of Model =      4.2 MB of RAM.

**Input Runstream File:          aermod.inp
**Output Print File:             aermod.out

**Detailed Error/Message File:   ARCHTWN2.err
**File for Summary of Results:   ARCHTWN2.sum
```

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** AREAPOLY SOURCE DATA ***

SOURCE ID	NUMBER PART. CATS.	EMISSION RATE (GRAMS/SEC /METER**2)	LOCATION OF AREA X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	NUMBER OF VERTS.	INIT. SZ (METERS)	URBAN SOURCE	EMISSION RATE SCALAR VARY BY
PAREA1	0	0.35100E-05	657785.1	4196830.6	10.7	3.05	16	0.00	NO	HROFDY

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** LINE SOURCE DATA ***

SOURCE ID	NUMBER PART. CATS.	EMISSION RATE (GRAMS/SEC /METER**2)	FIRST COORD X (METERS)	FIRST COORD Y (METERS)	SECOND COORD X (METERS)	SECOND COORD Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	WIDTH OF LINE (METERS)	INIT. SZ (METERS)	URBAN SOURCE	EMISSION RATE SCALAR VARY BY
ALINE1	0	0.25900E-03	656818.7	4196799.4	657243.1	4196816.2	9.5	3.05	9.14	0.00	NO	
ALINE2	0	0.25500E-03	658045.7	4196425.4	658066.7	4195996.8	11.0	3.05	9.14	0.00	NO	

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** SOURCE IDs DEFINING SOURCE GROUPS ***

SRCGROUP ID	SOURCE IDs
PAREA1	PAREA1 ,
ALINE1	ALINE1 ,
ALINE2	ALINE2 ,
ALL	PAREA1 , ALINE1 , ALINE2 ,

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

SOURCE ID = PAREA1   ; SOURCE TYPE = AREAPOLY :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.10000E+01	8	.10000E+01	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.10000E+01	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** GRIDDED RECEPTOR NETWORK SUMMARY ***

*** NETWORK ID: UCART1   ; NETWORK TYPE: GRIDCART ***

*** X-COORDINATES OF GRID ***
(METERS)

656453.4, 656503.4, 656553.4, 656603.4, 656653.4, 656703.4, 656753.4, 656803.4, 656853.4, 656903.4,
656953.4, 657003.4, 657053.4, 657103.4, 657153.4, 657203.4, 657253.4, 657303.4, 657353.4, 657403.4,
657453.4, 657503.4, 657553.4, 657603.4, 657653.4, 657703.4, 657753.4, 657803.4, 657853.4, 657903.4,
657953.4, 658003.4, 658053.4, 658103.4, 658153.4, 658203.4, 658253.4, 658303.4, 658353.4, 658403.4,
658453.4, 658503.4, 658553.4, 658603.4, 658653.4, 658703.4, 658753.4, 658803.4, 658853.4, 658903.4,

*** Y-COORDINATES OF GRID ***
(METERS)

4195049.9, 4195099.9, 4195149.9, 4195199.9, 4195249.9, 4195299.9, 4195349.9, 4195399.9, 4195449.9, 4195499.9,
4195549.9, 4195599.9, 4195649.9, 4195699.9, 4195749.9, 4195799.9, 4195849.9, 4195899.9, 4195949.9, 4195999.9,
4196049.9, 4196099.9, 4196149.9, 4196199.9, 4196249.9, 4196299.9, 4196349.9, 4196399.9, 4196449.9, 4196499.9,
4196549.9, 4196599.9, 4196649.9, 4196699.9, 4196749.9, 4196799.9, 4196849.9, 4196899.9, 4196949.9, 4196999.9,
4197049.9, 4197099.9, 4197149.9, 4197199.9, 4197249.9, 4197299.9, 4197349.9, 4197399.9, 4197449.9, 4197499.9,

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS) 656453.42	656503.42	656553.42	656603.42	656653.42	656703.42	656753.42	656803.42	656853.42
4197499.93	9.10	9.10	9.10	9.10	9.40	9.40	9.40	9.40	9.60
4197449.93	9.10	9.10	9.20	9.40	9.40	9.40	9.40	9.40	9.70
4197399.93	9.10	9.10	9.20	9.40	9.40	9.40	9.40	9.40	9.80
4197349.93	9.10	9.10	9.20	9.40	9.40	9.40	9.40	9.40	9.80
4197299.93	9.10	9.10	9.10	9.40	9.40	9.40	9.40	9.40	9.60
4197249.93	9.10	9.10	9.10	9.10	9.40	9.40	9.40	9.40	9.60
4197199.93	9.10	9.10	9.10	9.10	9.40	9.40	9.40	9.40	9.50
4197149.93	9.10	9.10	9.10	9.10	9.30	9.40	9.40	9.40	9.40
4197099.93	9.10	9.10	9.10	9.10	9.10	9.40	9.40	9.40	9.40
4197049.93	9.10	9.10	9.10	9.10	9.10	9.40	9.40	9.40	9.40
4196999.93	9.10	9.10	9.10	9.10	9.10	9.30	9.40	9.40	9.40
4196949.93	9.10	9.10	9.10	9.10	9.10	9.20	9.40	9.40	9.40
4196899.93	9.10	9.10	9.10	9.10	9.10	9.20	9.40	9.40	9.40
4196849.93	9.10	9.10	9.10	9.10	9.10	9.20	9.40	9.40	9.40
4196799.93	9.10	9.10	9.10	9.10	9.10	9.10	9.40	9.40	9.40
4196749.93	9.10	9.10	9.10	9.10	9.10	9.10	9.20	9.40	9.40
4196699.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.20	9.30
4196649.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4196599.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4196549.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4196499.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4196449.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4196399.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4196349.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.20
4196299.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.20
4196249.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.40
4196199.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.40
4196149.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.20
4196099.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4196049.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4195999.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4195949.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4195899.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4195849.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4195799.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4195749.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4195699.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4195649.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4195599.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10
4195549.93	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10	9.10

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(657842.0,	4196709.9,	10.9,	10.9,	1.5);	(657850.2,	4196856.8,	10.7,	10.7,	1.5);
(657815.3,	4196897.2,	10.7,	10.7,	1.5);	(657866.9,	4196711.5,	11.0,	11.0,	1.5);
(657875.1,	4196858.4,	10.7,	10.7,	1.5);	(657858.3,	4196892.6,	10.7,	10.7,	1.5);
(657831.9,	4196916.0,	10.7,	10.7,	1.5);	(657891.9,	4196713.1,	11.0,	11.0,	1.5);
(657783.7,	4196834.8,	10.7,	10.7,	1.5);	(657792.1,	4196706.6,	10.7,	10.7,	1.5);
(658002.4,	4196716.4,	11.0,	11.0,	1.5);	(658002.4,	4196832.0,	11.0,	11.0,	1.5);
(658051.2,	4196830.6,	11.0,	11.0,	1.5);	(658055.4,	4196428.0,	11.0,	11.0,	1.5);
(657251.6,	4196414.1,	9.8,	9.8,	1.5);	(657241.8,	4196816.7,	9.7,	9.7,	1.5);
(657428.5,	4196823.6,	10.7,	10.7,	1.5);	(657456.4,	4196765.1,	10.7,	10.7,	1.5);
(657480.0,	4196723.3,	10.4,	10.4,	1.5);	(657502.3,	4196708.0,	10.4,	10.4,	1.5);
(657549.7,	4196699.6,	10.5,	10.5,	1.5);	(657574.8,	4196708.0,	10.6,	10.6,	1.5);
(657598.5,	4196741.4,	10.7,	10.7,	1.5);	(657611.0,	4196766.5,	10.7,	10.7,	1.5);
(657622.1,	4196797.2,	10.7,	10.7,	1.5);	(657620.7,	4196825.0,	10.7,	10.7,	1.5);

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** METEOROLOGICAL DAYS SELECTED FOR PROCESSING ***
(1=YES; 0=NO)

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1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1  1 1 1 1 1
```

NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.

*** UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED CATEGORIES ***
(METERS/SEC)

1.54,   3.09,   5.14,   8.23, 10.80,

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** UP TO THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

Surface file: ..\hoggan2\Stockton_2013-2017.SFC Met Version: 18081
Profile file: ..\hoggan2\Stockton_2013-2017.PFL
Surface format: FREE
Profile format: FREE
Surface station no.: 23237 Upper air station no.: 23230
Name: UNKNOWN Name: OAKLAND/WSO_AP
Year: 2013 Year: 2013

First 24 hours of scalar data

YR	MO	DY	JDY	HR	H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS	WD	HT	REF TA	HT
13	01	01	1	01	-22.0	0.211	-9.000	-9.000	-999.	232.	48.8	0.07	2.20	1.00	2.78	149.	10.0	273.8	2.0
13	01	01	1	02	-14.6	0.158	-9.000	-9.000	-999.	152.	27.6	0.04	2.20	1.00	2.37	77.	10.0	273.8	2.0
13	01	01	1	03	-18.4	0.181	-9.000	-9.000	-999.	185.	36.0	0.06	2.20	1.00	2.52	97.	10.0	273.1	2.0
13	01	01	1	04	-6.7	0.105	-9.000	-9.000	-999.	84.	16.0	0.04	2.20	1.00	1.63	349.	10.0	272.5	2.0
13	01	01	1	05	-20.1	0.193	-9.000	-9.000	-999.	203.	40.9	0.04	2.20	1.00	2.86	356.	10.0	274.2	2.0
13	01	01	1	06	-3.9	0.081	-9.000	-9.000	-999.	64.	12.6	0.04	2.20	1.00	1.23	77.	10.0	273.8	2.0
13	01	01	1	07	-18.3	0.180	-9.000	-9.000	-999.	184.	35.8	0.06	2.20	1.00	2.52	255.	10.0	273.1	2.0
13	01	01	1	08	-26.9	0.259	-9.000	-9.000	-999.	316.	73.8	0.08	2.20	0.73	3.29	287.	10.0	274.2	2.0
13	01	01	1	09	-1.9	0.212	-9.000	-9.000	-999.	236.	461.6	0.05	2.20	0.39	2.81	315.	10.0	275.9	2.0
13	01	01	1	10	61.1	0.155	0.630	0.005	150.	147.	-5.5	0.04	2.20	0.27	1.60	336.	10.0	277.5	2.0
13	01	01	1	11	110.2	0.238	1.137	0.005	488.	279.	-11.2	0.06	2.20	0.23	2.45	228.	10.0	279.9	2.0
13	01	01	1	12	137.1	0.276	1.492	0.008	886.	347.	-14.0	0.08	2.20	0.22	2.69	286.	10.0	280.4	2.0
13	01	01	1	13	141.1	0.271	1.531	0.007	929.	339.	-12.9	0.05	2.20	0.21	2.88	325.	10.0	282.5	2.0
13	01	01	1	14	121.3	0.232	1.475	0.006	965.	269.	-9.4	0.04	2.20	0.22	2.57	356.	10.0	283.8	2.0
13	01	01	1	15	78.7	0.218	1.287	0.005	988.	244.	-12.0	0.04	2.20	0.26	2.47	357.	10.0	284.2	2.0
13	01	01	1	16	17.6	0.265	0.783	0.005	993.	327.	-96.0	0.03	2.20	0.35	3.59	2.	10.0	284.2	2.0
13	01	01	1	17	-11.2	0.143	-9.000	-9.000	-999.	139.	24.1	0.04	2.20	0.60	2.16	346.	10.0	282.5	2.0
13	01	01	1	18	-8.7	0.125	-9.000	-9.000	-999.	107.	20.6	0.08	2.20	1.00	1.67	273.	10.0	279.2	2.0
13	01	01	1	19	-13.3	0.154	-9.000	-9.000	-999.	145.	26.0	0.06	2.20	1.00	2.15	238.	10.0	278.1	2.0
13	01	01	1	20	-10.2	0.134	-9.000	-9.000	-999.	117.	21.4	0.06	2.20	1.00	1.89	230.	10.0	275.9	2.0
13	01	01	1	21	-12.5	0.148	-9.000	-9.000	-999.	137.	24.2	0.05	2.20	1.00	2.11	300.	10.0	276.4	2.0
13	01	01	1	22	-999.0	-9.000	-9.000	-9.000	-999.	-999.	-99999.0	0.05	2.20	1.00	0.00	0.	10.0	275.9	2.0
13	01	01	1	23	-24.0	0.230	-9.000	-9.000	-999.	264.	57.9	0.04	2.20	1.00	3.36	80.	10.0	274.2	2.0
13	01	01	1	24	-16.1	0.169	-9.000	-9.000	-999.	167.	31.3	0.06	2.20	1.00	2.36	100.	10.0	274.2	2.0

First hour of profile data

YR	MO	DY	HR	HEIGHT	F	WDIR	WSPD	AMB_TMP	sigmaA	sigmaW	sigmaV
13	01	01	01	10.0	1	149.	2.78	273.8	99.0	-99.00	-99.00

F indicates top of profile (=1) or below (=0)

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: PAREA1 ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** CONC OF DPM IN MICROGRAMS/M**3 **

Y-COORD (METERS)	X-COORD (METERS) 656453.42	656503.42	656553.42	656603.42	656653.42	656703.42	656753.42	656803.42	656853.42
4197499.93	0.21181	0.22184	0.23242	0.24340	0.25457	0.26555	0.27598	0.28546	0.29363
4197449.93	0.21952	0.23039	0.24202	0.25426	0.26693	0.27970	0.29217	0.30385	0.31427
4197399.93	0.22735	0.23909	0.25179	0.26536	0.27967	0.29442	0.30920	0.32346	0.33655
4197349.93	0.23516	0.24787	0.26168	0.27661	0.29263	0.30952	0.32690	0.34418	0.36056
4197299.93	0.24267	0.25653	0.27156	0.28792	0.30568	0.32479	0.34498	0.36570	0.38614
4197249.93	0.24945	0.26470	0.28120	0.29914	0.31875	0.34011	0.36319	0.38763	0.41267
4197199.93	0.25500	0.27180	0.29004	0.30990	0.33163	0.35541	0.38146	0.40972	0.43973
4197149.93	0.25906	0.27738	0.29743	0.31943	0.34364	0.37025	0.39961	0.43190	0.46711
4197099.93	0.26169	0.28130	0.30299	0.32707	0.35383	0.38366	0.41684	0.45375	0.49465
4197049.93	0.26315	0.28378	0.30681	0.33264	0.36172	0.39463	0.43182	0.47389	0.52136
4196999.93	0.26385	0.28521	0.30925	0.33646	0.36742	0.40291	0.44368	0.49076	0.54516
4196949.93	0.26430	0.28612	0.31088	0.33911	0.37149	0.40898	0.45260	0.50386	0.56447
4196899.93	0.26482	0.28690	0.31214	0.34112	0.37459	0.41363	0.45946	0.51396	0.57952
4196849.93	0.26528	0.28743	0.31293	0.34241	0.37672	0.41702	0.46466	0.52180	0.59132
4196799.93	0.26543	0.28747	0.31294	0.34258	0.37732	0.41838	0.46744	0.52663	0.59930
4196749.93	0.26529	0.28715	0.31243	0.34192	0.37666	0.41799	0.46778	0.52832	0.60323
4196699.93	0.26499	0.28674	0.31185	0.34112	0.37561	0.41675	0.46649	0.52758	0.60358
4196649.93	0.26456	0.28630	0.31134	0.34045	0.37466	0.41537	0.46448	0.52467	0.59976
4196599.93	0.26384	0.28562	0.31062	0.33957	0.37340	0.41339	0.46128	0.51957	0.59189
4196549.93	0.26252	0.28419	0.30896	0.33747	0.37060	0.40951	0.45578	0.51165	0.58028
4196499.93	0.26047	0.28166	0.30579	0.33347	0.36551	0.40294	0.44717	0.50003	0.56406
4196449.93	0.25799	0.27844	0.30165	0.32816	0.35867	0.39405	0.43539	0.48416	0.54236
4196399.93	0.25542	0.27502	0.29714	0.32222	0.35080	0.38355	0.42131	0.46521	0.51684
4196349.93	0.25235	0.27092	0.29170	0.31501	0.34126	0.37093	0.40469	0.44339	0.48830
4196299.93	0.24794	0.26520	0.28430	0.30547	0.32900	0.35526	0.38469	0.41787	0.45558
4196249.93	0.24170	0.25738	0.27452	0.29329	0.31387	0.33650	0.36149	0.38916	0.41993
4196199.93	0.23357	0.24751	0.26255	0.27882	0.29645	0.31561	0.33649	0.35925	0.38406
4196149.93	0.22381	0.23597	0.24898	0.26293	0.27792	0.29407	0.31143	0.33000	0.34980
4196099.93	0.21295	0.22351	0.23474	0.24670	0.25946	0.27301	0.28731	0.30232	0.31806
4196049.93	0.20173	0.21092	0.22063	0.23089	0.24168	0.25296	0.26467	0.27683	0.28960
4195999.93	0.19069	0.19870	0.20708	0.21582	0.22488	0.23423	0.24386	0.25388	0.26447
4195949.93	0.18011	0.18705	0.19424	0.20165	0.20924	0.21702	0.22505	0.23344	0.24233
4195899.93	0.17005	0.17604	0.18217	0.18843	0.19481	0.20135	0.20811	0.21521	0.22271
4195849.93	0.16054	0.16566	0.17088	0.17617	0.18155	0.18708	0.19283	0.19886	0.20522
4195799.93	0.15152	0.15589	0.16031	0.16479	0.16937	0.17408	0.17899	0.18415	0.18960
4195749.93	0.14295	0.14667	0.15044	0.15426	0.15817	0.16222	0.16646	0.17094	0.17569
4195699.93	0.13482	0.13801	0.14123	0.14452	0.14791	0.15144	0.15517	0.15914	0.16334
4195649.93	0.12716	0.12991	0.13271	0.13558	0.13856	0.14170	0.14505	0.14862	0.15239
4195599.93	0.11999	0.12240	0.12487	0.12742	0.13009	0.13295	0.13601	0.13926	0.14267
4195549.93	0.11335	0.11550	0.11771	0.12001	0.12246	0.12510	0.12793	0.13091	0.13402

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: PAREA1 ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** CONC OF DPM IN MICROGRAMS/M**3 **

Y-COORD (METERS)	X-COORD (METERS) 656453.42	656503.42	656553.42	656603.42	656653.42	656703.42	656753.42	656803.42	656853.42
4195499.93	0.10724	0.10918	0.11119	0.11332	0.11560	0.11807	0.12070	0.12344	0.12629
4195449.93	0.10164	0.10342	0.10528	0.10727	0.10944	0.11176	0.11420	0.11672	0.11935
4195399.93	0.09653	0.09817	0.09993	0.10183	0.10389	0.10608	0.10833	0.11064	0.11306
4195349.93	0.09185	0.09341	0.09509	0.09691	0.09887	0.10091	0.10299	0.10510	0.10733
4195299.93	0.08759	0.08908	0.09070	0.09246	0.09431	0.09620	0.09809	0.10001	0.10207
4195249.93	0.08371	0.08515	0.08672	0.08840	0.09012	0.09185	0.09356	0.09532	0.09722
4195199.93	0.08016	0.08157	0.08308	0.08466	0.08625	0.08781	0.08936	0.09096	0.09273
4195149.93	0.07693	0.07829	0.07973	0.08120	0.08264	0.08404	0.08543	0.08691	0.08856
4195099.93	0.07395	0.07526	0.07662	0.07796	0.07925	0.08050	0.08176	0.08313	0.08470
4195049.93	0.07121	0.07245	0.07369	0.07490	0.07605	0.07717	0.07833	0.07962	0.08111

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 , ALINE1 , ALINE2 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
657471.24	4196392.89	629.68270	(14012217)	657446.88	4196392.47	599.94572	(14012217)
657422.53	4196392.05	565.15623	(14012217)	657398.17	4196391.63	539.10778	(14121216)
657373.81	4196391.20	510.58582	(14121216)	657349.46	4196390.78	477.21818	(14121216)
657325.10	4196390.36	436.43875	(14121216)	657300.75	4196389.94	429.07344	(13040307)
657276.39	4196389.52	436.74775	(13040307)	657252.03	4196389.09	444.05647	(13040307)
658073.70	4196385.59	2359.64035	(14060106)	658031.86	4196377.61	3222.65468	(13123109)
658007.50	4196377.18	2082.68138	(13123109)	657983.15	4196376.76	1416.02928	(13123109)
657958.79	4196376.34	1142.89560	(15090607)	657934.44	4196375.92	981.46350	(14060906)
657910.08	4196375.49	878.51263	(14060906)	657885.72	4196375.07	796.33030	(14060906)
657861.37	4196374.65	729.81666	(14060906)	657837.01	4196374.23	674.60813	(14060906)
657812.66	4196373.81	626.42868	(14060906)	657788.30	4196373.38	610.62981	(17011509)
657763.94	4196372.96	604.04960	(17011509)	657739.59	4196372.54	592.56750	(17011509)
657715.23	4196372.12	576.80688	(17011509)	657690.88	4196371.70	586.72822	(14012217)
657666.52	4196371.27	606.11323	(14012217)	657642.16	4196370.85	620.33705	(14012217)
657617.81	4196370.43	629.01320	(14012217)	657593.45	4196370.01	631.57761	(14012217)
657569.10	4196369.59	627.20852	(14012217)	657544.74	4196369.16	616.43684	(14012217)
657520.38	4196368.74	599.14110	(14012217)	657496.03	4196368.32	576.78514	(14012217)
657471.67	4196367.90	548.51136	(14012217)	657447.31	4196367.47	527.14628	(14121216)
657422.96	4196367.05	506.56703	(14121216)	657398.60	4196366.63	481.11391	(14121216)
657374.25	4196366.21	450.45032	(14121216)	657349.89	4196365.79	414.92272	(14121216)
657325.53	4196365.36	379.98784	(15030907)	657301.18	4196364.94	363.32062	(15011209)
657276.82	4196364.52	374.18200	(15011209)	657252.47	4196364.10	357.13006	(13040307)
658074.14	4196360.60	2402.58941	(14060106)	658116.19	4196393.42	1293.04303	(14060106)
658032.29	4196352.61	3168.46079	(13123109)	658007.94	4196352.19	2023.25114	(13123109)
657983.58	4196351.76	1349.24014	(15090607)	657959.23	4196351.34	1132.93341	(15090607)
657934.87	4196350.92	978.32122	(14060906)	657910.51	4196350.50	875.01252	(14060906)
657886.16	4196350.08	793.64583	(14060906)	657861.80	4196349.65	726.76879	(14060906)
657837.45	4196349.23	670.77048	(14060906)	657813.09	4196348.81	620.02664	(14060906)
657788.73	4196348.39	572.79444	(14060906)	657764.38	4196347.97	542.47205	(17011509)
657740.02	4196347.54	525.24050	(17011509)	657715.66	4196347.12	545.00162	(14012217)
657691.31	4196346.70	562.50679	(14012217)	657666.95	4196346.28	575.64067	(14012217)
657642.60	4196345.86	583.19468	(14012217)	657618.24	4196345.43	584.85691	(14012217)
657593.88	4196345.01	580.66556	(14012217)	657569.53	4196344.59	570.72771	(14012217)
657545.17	4196344.17	554.22686	(14012217)	657520.82	4196343.74	532.43890	(14012217)
657496.46	4196343.32	508.14778	(14121216)	657472.10	4196342.90	495.81645	(14121216)
657447.75	4196342.48	477.53219	(14121216)	657423.39	4196342.06	454.81280	(14121216)
657399.04	4196341.63	427.25333	(14121216)	657374.68	4196341.21	395.21177	(14121216)
657350.32	4196340.79	365.44468	(15030907)	657325.97	4196340.37	341.93768	(15030907)
657301.61	4196339.95	340.85233	(15011209)	657277.26	4196339.52	348.50351	(15011209)
657252.90	4196339.10	324.41421	(15011209)	658074.57	4196335.60	2420.61115	(14060106)

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 , ALINE1 , ALINE2 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
658109.55	4196350.73	1394.96439	(14060106)	658134.11	4196375.99	1095.86647	(17022508)
658032.73	4196327.61	3105.98140	(13123109)	658008.37	4196327.19	1954.59875	(13123109)
657984.01	4196326.77	1339.70049	(15090607)	657959.66	4196326.35	1120.64740	(15090607)
657935.30	4196325.92	975.95309	(14060906)	657910.95	4196325.50	872.29543	(14060906)
657886.59	4196325.08	789.77324	(14060906)	657862.23	4196324.66	722.75494	(14060906)
657837.88	4196324.24	664.05556	(14060906)	657813.52	4196323.81	609.53587	(14060906)
657789.17	4196323.39	556.99303	(14060906)	657764.81	4196322.97	503.97033	(14060906)
657740.45	4196322.55	510.84247	(14012217)	657716.10	4196322.13	527.04981	(14012217)
657691.74	4196321.70	538.36382	(14012217)	657667.39	4196321.28	545.41161	(14012217)
657643.03	4196320.86	546.60891	(14012217)	657618.67	4196320.44	542.07681	(14012217)
657594.32	4196320.01	532.06845	(14012217)	657569.96	4196319.59	516.90358	(14012217)
657545.61	4196319.17	496.05671	(14012217)	657521.25	4196318.75	478.74834	(14121216)
657496.89	4196318.33	469.06638	(14121216)	657472.54	4196317.90	453.34718	(14121216)
657448.18	4196317.48	432.57335	(14121216)	657423.83	4196317.06	407.56369	(14121216)
657399.47	4196316.64	378.80384	(14121216)	657375.11	4196316.22	349.31323	(15030907)
657350.76	4196315.79	334.62951	(15030907)	657326.40	4196315.37	310.12915	(15030907)
657302.04	4196314.95	320.44692	(15011209)	657277.69	4196314.53	326.00750	(15011209)
657253.33	4196314.11	307.73137	(15011209)	657226.61	4196413.48	538.49771	(13040307)
657226.03	4196437.16	546.55439	(13040307)	657225.46	4196460.85	573.68147	(13121509)
657224.88	4196484.53	591.07625	(13122609)	657224.31	4196508.21	621.11607	(13122609)
657223.74	4196531.89	635.73205	(13122609)	657223.16	4196555.57	638.89673	(13122609)
657222.59	4196579.25	634.44768	(13122609)	657222.01	4196602.93	624.89331	(13122609)
657221.44	4196626.61	658.31427	(14012217)	657220.87	4196650.29	720.50440	(14012217)
657220.29	4196673.97	794.59184	(14012217)	657219.72	4196697.65	885.95456	(14012217)
657219.14	4196721.33	998.00297	(14012217)	657218.57	4196745.01	1322.34300	(15060806)
657218.00	4196768.69	1809.93089	(15060806)	657217.42	4196792.37	2639.15330	(15060806)
657216.85	4196816.05	4878.72253	(14092807)	657209.30	4196395.44	474.51040	(13040307)
657201.04	4196436.56	514.27285	(13121509)	657200.47	4196460.24	545.77474	(13121509)
657199.89	4196483.92	554.18389	(13121509)	657199.32	4196507.60	580.12758	(13122609)
657198.74	4196531.28	597.22375	(13122609)	657198.17	4196554.96	602.53292	(13122609)
657197.60	4196578.64	599.65019	(13122609)	657197.02	4196602.32	594.72962	(14012217)
657196.45	4196626.00	654.29583	(14012217)	657195.87	4196649.68	719.56481	(14012217)
657195.30	4196673.36	794.27170	(14012217)	657194.73	4196697.05	886.95154	(14012217)
657194.15	4196720.73	1008.59429	(14012217)	657193.58	4196744.41	1292.67799	(15060806)
657193.00	4196768.09	1797.41758	(15060806)	657192.43	4196791.77	2644.96014	(15060806)
657191.85	4196815.45	4764.82052	(14092807)	657184.31	4196394.84	456.67558	(13040307)
657217.42	4196353.01	338.58748	(13040307)	657176.05	4196435.95	483.02602	(13121509)
657175.47	4196459.63	515.19170	(13121509)	657174.90	4196483.31	524.62025	(13121509)
657174.33	4196506.99	540.37845	(13122609)	657173.75	4196530.68	559.21457	(13122609)
657173.18	4196554.36	566.21236	(13122609)	657172.60	4196578.04	565.43559	(13122609)

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 , ALINE1 , ALINE2 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
657172.03	4196601.72	579.89760	(14012217)	657171.45	4196625.40	646.52086	(14012217)
657170.88	4196649.08	715.93255	(14012217)	657170.31	4196672.76	793.88773	(14012217)
657169.73	4196696.44	888.04915	(14012217)	657169.16	4196720.12	1011.03757	(14012217)
657168.58	4196743.80	1257.18710	(15060806)	657168.01	4196767.48	1778.90373	(15060806)
657167.44	4196791.16	2667.26408	(15060806)	657166.86	4196814.84	4644.08430	(14092807)
657159.32	4196394.23	436.34274	(13040307)	657174.69	4196359.36	366.85750	(13040307)
657200.11	4196334.97	301.55550	(13040307)	657151.06	4196435.35	455.54345	(13121509)
657150.48	4196459.03	487.41586	(13121509)	657149.91	4196482.71	497.74434	(13121509)
657149.33	4196506.39	504.84375	(13122609)	657148.76	4196530.07	525.54925	(13122609)
657148.18	4196553.75	534.65619	(13122609)	657147.61	4196577.43	535.53402	(13122609)
657147.04	4196601.11	556.43245	(14012217)	657146.46	4196624.79	633.37743	(14012217)
657145.89	4196648.47	709.22180	(14012217)	657145.31	4196672.15	791.90698	(14012217)
657144.74	4196695.83	888.63002	(14012217)	657144.17	4196719.51	1012.16575	(14012217)
657143.59	4196743.19	1212.01392	(15060806)	657143.02	4196766.88	1755.86928	(15060806)
657142.44	4196790.56	2666.83194	(15060806)	657141.87	4196814.24	4520.08107	(14092807)
657240.91	4196841.64	2464.53335	(16091407)	657264.24	4196842.51	2418.79304	(16091407)
657287.57	4196843.38	2111.46495	(16091407)	657310.91	4196844.25	1818.40230	(15021908)
657334.24	4196845.12	1630.81903	(15021908)	657357.57	4196845.99	1457.27515	(15021908)
657380.90	4196846.86	1304.74786	(15021908)	657404.24	4196847.73	1175.08821	(15021908)
657427.57	4196848.60	1065.08394	(15021908)	657222.70	4196858.77	1727.38408	(14091107)
657263.31	4196867.50	1597.47892	(14091107)	657286.64	4196868.37	1595.08002	(16091407)
657309.97	4196869.24	1549.65163	(16091407)	657333.31	4196870.11	1433.18711	(16091407)
657356.64	4196870.98	1283.72478	(16091407)	657379.97	4196871.85	1130.45441	(16091407)
657403.30	4196872.72	990.55440	(15021908)	657426.64	4196873.59	939.97103	(15021908)
657221.76	4196883.75	1300.22024	(14091107)	657180.42	4196850.31	1883.76147	(16091407)
657262.38	4196892.48	1231.43617	(14091107)	657285.71	4196893.35	1242.16670	(14091107)
657309.04	4196894.22	1237.84128	(14091107)	657332.38	4196895.09	1185.55849	(14091107)
657355.71	4196895.96	1126.43780	(16091407)	657379.04	4196896.83	1077.19321	(16091407)
657402.37	4196897.70	1010.07834	(16091407)	657425.71	4196898.57	932.90897	(16091407)
657220.83	4196908.73	992.57090	(14091107)	657186.27	4196893.02	1122.64379	(14091107)
657162.21	4196867.43	1483.79544	(14091107)	657261.45	4196917.46	965.17042	(14091107)
657284.78	4196918.33	986.59864	(14091107)	657308.11	4196919.20	1002.56418	(14091107)
657331.44	4196920.07	1007.11762	(14091107)	657354.78	4196920.94	993.49172	(14091107)
657378.11	4196921.81	950.13188	(14091107)	657401.44	4196922.68	881.40658	(14091107)
657424.77	4196923.55	847.57912	(16091407)	657451.07	4196834.37	996.17136	(14092807)
657469.64	4196795.37	1052.86546	(14092807)	657464.02	4196855.75	926.99732	(15021908)
657482.93	4196825.62	952.73361	(14092807)	657501.50	4196786.62	906.22114	(14092807)
657481.78	4196871.82	839.31580	(15021908)	657505.50	4196836.37	829.77533	(14092807)
657524.07	4196797.37	863.22667	(14092807)	657505.96	4196880.80	755.91755	(15021908)
657461.79	4196913.95	814.91828	(16091407)	657528.07	4196847.12	735.60780	(15021908)

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 , ALINE1 , ALINE2 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
657546.64	4196808.12	806.61302	(14092807)	657489.95	4196756.55	773.37018	(14092807)
657501.79	4196735.65	783.04088	(14012017)	657523.54	4196747.98	694.53382	(14012017)
657545.29	4196760.30	684.50062	(14092807)	657567.04	4196772.63	696.22952	(14092807)
657554.04	4196724.27	664.63659	(14012017)	657567.07	4196798.13	755.41818	(14092807)
657593.06	4196790.37	701.93375	(15090607)	657595.77	4196823.77	715.54117	(15090607)
657570.80	4196822.53	732.55271	(14092807)	657520.86	4196820.04	856.99247	(14092807)
657619.25	4196849.98	762.05003	(15090607)	657642.53	4196851.37	762.23802	(15090607)
657665.81	4196852.76	744.97588	(15090607)	657689.10	4196854.15	705.01042	(15090607)
657712.38	4196855.55	662.64454	(16022908)	657735.66	4196856.94	669.43783	(16022908)
657758.94	4196858.33	637.71047	(16022908)	657782.23	4196859.73	606.32690	(13123109)
657600.63	4196866.66	715.31594	(15090607)	657641.04	4196876.32	700.09156	(15090607)
657664.32	4196877.72	669.16232	(15090607)	657687.60	4196879.11	615.56371	(15090607)
657710.89	4196880.50	628.36984	(16022908)	657734.17	4196881.90	621.44682	(16022908)
657757.45	4196883.29	586.32576	(16022908)	657780.73	4196884.68	595.11013	(13123109)
657599.13	4196891.61	678.12298	(15090607)	657558.53	4196857.14	686.66287	(15021908)
657639.54	4196901.28	636.73459	(15090607)	657662.83	4196902.67	593.61953	(15090607)
657686.11	4196904.06	584.00559	(16022908)	657709.39	4196905.46	593.24157	(16022908)
657732.68	4196906.85	577.48435	(16022908)	657755.96	4196908.24	559.92322	(13123109)
657779.24	4196909.64	584.29965	(13123109)	657597.64	4196916.57	635.55471	(15090607)
657563.39	4196900.02	633.31220	(15090607)	657539.91	4196873.82	720.34698	(15021908)
657638.05	4196926.23	573.24065	(15090607)	657661.33	4196927.63	540.47277	(16022908)
657684.62	4196929.02	559.53852	(16022908)	657707.90	4196930.41	559.35764	(16022908)
657731.18	4196931.81	538.73758	(16022908)	657754.47	4196933.20	545.30382	(13123109)
657777.75	4196934.59	572.36316	(13123109)	657808.67	4196836.40	668.75826	(13123109)
657817.02	4196708.24	807.58372	(16022908)	657825.21	4196855.14	697.12318	(13123109)
657841.96	4196709.86	849.51802	(16022908)	657850.15	4196856.77	721.53410	(13123109)
657815.31	4196897.22	646.28576	(13123109)	657866.91	4196711.49	957.11281	(13123109)
657875.10	4196858.39	700.64023	(13123109)	657858.29	4196892.63	655.75065	(13123109)
657831.85	4196915.96	635.53309	(13123109)	657891.86	4196713.11	1043.80243	(13123109)
657783.72	4196834.77	626.63318	(16022908)	657792.07	4196706.61	816.59589	(15090607)
658002.41	4196716.36	929.42181	(14122309)	658002.41	4196831.98	747.30935	(14122309)
658051.17	4196830.59	653.60336	(15011909)	658055.35	4196428.02	3446.54735	(15011909)
657251.60	4196414.09	553.21277	(13040307)	657241.84	4196816.66	5038.03695	(14092807)
657428.50	4196823.62	1170.06102	(14092807)	657456.36	4196765.12	903.35891	(14092807)
657480.04	4196723.33	811.65328	(14012017)	657502.33	4196708.01	748.45829	(14122809)
657549.69	4196699.65	668.11643	(14012017)	657574.77	4196708.01	633.24982	(14012017)
657598.45	4196741.44	681.07717	(13011809)	657610.99	4196766.51	732.33483	(15090607)
657622.13	4196797.16	775.33709	(15090607)	657620.74	4196825.02	789.23931	(15090607)

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** THE SUMMARY OF MAXIMUM PERIOD (43824 HRS) RESULTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

GROUP ID	AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	OF TYPE	NETWORK GRID-ID
PAREA1	1ST HIGHEST VALUE IS	13.90278 AT (657753.42, 4196549.93, 10.70, 10.70, 1.50)	GC	UCART1
	2ND HIGHEST VALUE IS	13.87912 AT (657703.42, 4196549.93, 10.60, 10.60, 1.50)	GC	UCART1
	3RD HIGHEST VALUE IS	13.82918 AT (657653.42, 4196549.93, 10.40, 10.40, 1.50)	GC	UCART1
	4TH HIGHEST VALUE IS	13.82259 AT (657803.42, 4196549.93, 10.70, 10.70, 1.50)	GC	UCART1
	5TH HIGHEST VALUE IS	13.81774 AT (657603.42, 4196549.93, 10.40, 10.40, 1.50)	GC	UCART1
	6TH HIGHEST VALUE IS	13.81359 AT (657753.42, 4196599.93, 10.70, 10.70, 1.50)	GC	UCART1
	7TH HIGHEST VALUE IS	13.78452 AT (657703.42, 4196599.93, 10.70, 10.70, 1.50)	GC	UCART1
	8TH HIGHEST VALUE IS	13.74766 AT (657553.42, 4196549.93, 10.40, 10.40, 1.50)	GC	UCART1
	9TH HIGHEST VALUE IS	13.72712 AT (657803.42, 4196599.93, 10.70, 10.70, 1.50)	GC	UCART1
	10TH HIGHEST VALUE IS	13.67342 AT (657853.42, 4196549.93, 10.70, 10.70, 1.50)	GC	UCART1
ALINE1	1ST HIGHEST VALUE IS	288.68371 AT (657053.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
	2ND HIGHEST VALUE IS	288.25145 AT (657003.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
	3RD HIGHEST VALUE IS	279.84695 AT (657103.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
	4TH HIGHEST VALUE IS	273.36460 AT (656953.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
	5TH HIGHEST VALUE IS	262.06807 AT (657153.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
	6TH HIGHEST VALUE IS	248.40827 AT (656903.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
	7TH HIGHEST VALUE IS	233.23984 AT (657141.87, 4196814.24, 9.54, 9.54, 1.50)	DC	
	8TH HIGHEST VALUE IS	233.17517 AT (657203.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
	9TH HIGHEST VALUE IS	229.49256 AT (657166.86, 4196814.84, 9.54, 9.54, 1.50)	DC	
	10TH HIGHEST VALUE IS	222.76337 AT (657191.85, 4196815.45, 9.55, 9.55, 1.50)	DC	
ALINE2	1ST HIGHEST VALUE IS	168.02918 AT (658053.42, 4196349.93, 11.00, 11.00, 1.50)	GC	UCART1
	2ND HIGHEST VALUE IS	167.58219 AT (658074.57, 4196335.60, 10.97, 10.97, 1.50)	DC	
	3RD HIGHEST VALUE IS	162.96888 AT (658055.78, 4196403.02, 10.97, 10.97, 1.50)	DC	
	4TH HIGHEST VALUE IS	156.57794 AT (658074.14, 4196360.60, 10.97, 10.97, 1.50)	DC	
	5TH HIGHEST VALUE IS	156.15512 AT (658053.42, 4196399.93, 11.00, 11.00, 1.50)	GC	UCART1
	6TH HIGHEST VALUE IS	155.71954 AT (658053.42, 4196099.93, 11.00, 11.00, 1.50)	GC	UCART1
	7TH HIGHEST VALUE IS	154.45810 AT (658053.42, 4196299.93, 11.00, 11.00, 1.50)	GC	UCART1
	8TH HIGHEST VALUE IS	153.22335 AT (658053.42, 4196149.93, 11.00, 11.00, 1.50)	GC	UCART1
	9TH HIGHEST VALUE IS	148.39745 AT (658053.42, 4196049.93, 11.00, 11.00, 1.50)	GC	UCART1
	10TH HIGHEST VALUE IS	147.71311 AT (658053.42, 4196199.93, 11.00, 11.00, 1.50)	GC	UCART1
ALL	1ST HIGHEST VALUE IS	291.36795 AT (657053.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
	2ND HIGHEST VALUE IS	290.64674 AT (657003.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
	3RD HIGHEST VALUE IS	282.91404 AT (657103.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
	4TH HIGHEST VALUE IS	275.53138 AT (656953.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
	5TH HIGHEST VALUE IS	265.68531 AT (657153.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
	6TH HIGHEST VALUE IS	250.38894 AT (656903.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
	7TH HIGHEST VALUE IS	237.75320 AT (657203.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
	8TH HIGHEST VALUE IS	236.63360 AT (657141.87, 4196814.24, 9.54, 9.54, 1.50)	DC	
	9TH HIGHEST VALUE IS	233.20504 AT (657166.86, 4196814.84, 9.54, 9.54, 1.50)	DC	
	10TH HIGHEST VALUE IS	226.89819 AT (657191.85, 4196815.45, 9.55, 9.55, 1.50)	DC	

```
*** RECEPTOR TYPES:  GC = GRIDCART
                     GP = GRIDPOLR
                     DC = DISCCART
                     DP = DISCPOLR
```

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** THE SUMMARY OF HIGHEST 1-HR RESULTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

GROUP ID	AVERAGE CONC	DATE (YYMMDDHH)	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	OF TYPE	NETWORK GRID-ID
PAREA1 HIGH 1ST HIGH VALUE IS	569.93540	ON 13122609:	AT (657253.42, 4196649.93, 9.30, 9.30, 1.50)	GC	UCART1
ALINE1 HIGH 1ST HIGH VALUE IS	5122.98389	ON 13121509:	AT (656853.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1
ALINE2 HIGH 1ST HIGH VALUE IS	4147.27562	ON 15091807:	AT (658053.42, 4196149.93, 11.00, 11.00, 1.50)	GC	UCART1
ALL HIGH 1ST HIGH VALUE IS	5219.00330	ON 13121509:	AT (656853.42, 4196799.93, 9.40, 9.40, 1.50)	GC	UCART1

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR

*** MODELOPTs: NonDFAULT CONC FLAT and ELEV FLGPOL RURAL ADJ_U*

*** Message Summary : AERMOD Model Execution ***

 --------- Summary of Total Messages --------

A Total of   0 Fatal Error Message(s)
A Total of   12 Warning Message(s)
A Total of   971 Informational Message(s)

A Total of   43824 Hours Were Processed

A Total of   442 Calm Hours Identified

A Total of   529 Missing Hours Identified (1.21 Percent)

   ******** FATAL ERROR MESSAGES ********
              *** NONE ***

   ********   WARNING MESSAGES   ********
RE W213   1364   RECART: ELEV Input Inconsistent With Option: Input Ignored   UCART1
ME W186   88   MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used   0.50
ME W187   88   MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET
MX W420   34276   METQA: Wind Speed Out-of-Range.   KURDAT =   16112904
MX W420   34282   METQA: Wind Speed Out-of-Range.   KURDAT =   16112910
MX W420   34288   METQA: Wind Speed Out-of-Range.   KURDAT =   16112916
MX W420   34294   METQA: Wind Speed Out-of-Range.   KURDAT =   16112922
MX W420   34300   METQA: Wind Speed Out-of-Range.   KURDAT =   16113004
MX W420   40768   METQA: Wind Speed Out-of-Range.   KURDAT =   17082616
MX W420   40792   METQA: Wind Speed Out-of-Range.   KURDAT =   17082716
MX W420   40798   METQA: Wind Speed Out-of-Range.   KURDAT =   17082722
MX W420   40804   METQA: Wind Speed Out-of-Range.   KURDAT =   17082804

   ****
   *** AERMOD Finishes Successfully ***
   ****

HRA APPENDIX E

Excerpts of HARP2 Model

HARP2 - Air Dispersion & Risk Tool (dated 19121)

File Tools Help

- GLC Calc Setup
  - PLOTFILE List (non-pollutant spe
  - Emission Inventory
  - Background Concentrations
  - Screening Adjustment Factors
- Calculate\Import GLCs
- Pathway\Spatial Avg GLCs
- Contour GLCs (AERPLOT.EXE)
- Post Process
  - Max 30-Day Rolling Ave for Pb
  - Daily 8-Hr Ave GLCs for 8-Hr RE
  - Refined Worker Period Ave for C

Air Dispersion | Import/Calc GLCs | Risk Analysis

Emission Inventory

Add Import Export Delete All Options Filter:

	SrcID	StkID	ProID	PolID	PolAbbrev	Multiplier	Annual Ems (lbs/yr)	Max Hr Ems (lbs/hr)
	PAREA1	0	0	9901	DieselExhPM	1	12.36	0.01
	ALINE1	0	0	9901	DieselExhPM	1	2.59	0.01
	ALINE1	0	0	106990	1,3-Butadiene	1	1.021	0.000117
	ALINE1	0	0	71432	Benzene	1	13.761	0.00157
	ALINE1	0	0	50000	Formaldehyde	1	3.911	0.000446
	ALINE1	0	0	75070	Acetaldehyde	1	0.842	9.61E-05
	ALINE2	0	0	9901	DieselExhPM	1	2.59	0.01
	ALINE2	0	0	106990	1,3-Butadiene	1	1.021	0.000117
	ALINE2	0	0	71432	Benzene	1	13.761	0.00157
	ALINE2	0	0	50000	Formaldehyde	1	3.911	0.000446
▶	ALINE2	0	0	75070	Acetaldehyde	1	0.842	9.61E-05

HARP2 - Air Dispersion & Risk Tool (dated 19121)

File Tools Help

- Calculate Risk
  - Select Risk Scenario
  - Select Pathways to Evaluate and
  - Press Calculate
- View Risk Results
- Refined Acute Analysis
- Spatial Averaging Risk (Optional)
- Project Summary Report

Air Dispersion | Import/Calc GLCs | Risk Analysis

Select Risk Scenario

Analysis Type

- (•) Cancer Risk
- ( ) Chronic Risk (Non-cancer)
- ( ) 8-Hour Chronic Risk (Non-cancer)
- ( ) Acute Risk (Non-cancer)
- ( ) Cancer, Chronic, and Acute

Help me choose

Receptor Type

- (•) Individual Resident
- ( ) Population-Wide
- ( ) Worker

Help me choose

Exposure Duration

- (•) 70 Year
- ( ) 30 Year
- ( ) 25 Year (Worker)
- ( ) 9 Year
- ( ) User Defined (Tier 2) 70

Start Age (years) 3rd Trimester

Help me choose

Intake Rate Percentile

- (•) OEHHA Derived Method
- ( ) 95th (High End)
- ( ) 65th (Mean)
- ( ) Risk Management Policy (RMP) - *Inhalation Only*
- ( ) RMP using the Derived Method

Help me choose

HARP2 - Air Dispersion & Risk Tool (dated 19121)

File Tools Help

- Calculate Risk
  - Select Risk Scenario
  - Select Pathways to Evaluate and
  - Press Calculate
- View Risk Results
- Refined Acute Analysis
- Spatial Averaging Risk (Optional)
- Project Summary Report

Air Dispersion | Import/Calc GLCs | Risk Analysis

Select Pathways to Evaluate and Define Site Parameters

Pathways to Evaluate | Inh | Soil | Derm | MMilk | Drink Water | Fish | HG Produce | Beef & Dairy

- ( ) Inhalation Only
- (•) Mandatory Minimum Pathways
- ( ) Worker Pathways
- ( ) User Defined
  - [x] Inhalation (Always On)
  - [ ] Soil Ingestion
  - [ ] Dermal
  - [ ] Mother's Milk
  - [ ] Drinking Water
  - [ ] Fish
  - [ ] Homegrown Produce
  - [ ] Beef
  - [ ] Dairy Cows
  - [ ] Pigs
  - [ ] Chickens
  - [ ] Eggs

Deposition Rate (for noninhalation pathways only)

- (•) 0.05 m/s (uncontrolled sources)
- ( ) 0.02 m/s (controlled sources)
- ( ) Other

Advanced Options (Tier 2) - For noninhalation pathways only

[ ] Change exposure frequency (days/year): 350 What's this do?

Help me choose

Click to select SCAQMD mandatory minimum pathways

HARP2 - Air Dispersion & Risk Tool (dated 19121)

File Tools Help

Cancer Risk

- Calculate Risk
  - Select Risk Scenario
  - Select Pathways to Evaluate and
  - Press Calculate
- View Risk Results
- Refined Acute Analysis
- Spatial Averaging Risk (Optional)
- Project Summary Report

Air Dispersion | Import/Calc GLCs | Risk Analysis

View Risk Results

Cancer | Chronic | 8-hour | Acute

Load File | Risk Views | Options | Export

	REC	GRP	NETID	X	Y	RISK_SUM	SCENARIO
	1	ALL	UCART1	656453.42	4195049.93	7.9028e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	2	ALL	UCART1	656503.42	4195049.93	8.0704e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	3	ALL	UCART1	656553.42	4195049.93	8.2256e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	4	ALL	UCART1	656603.42	4195049.93	8.3668e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	5	ALL	UCART1	656653.42	4195049.93	8.4928e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	6	ALL	UCART1	656703.42	4195049.93	8.6029e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	7	ALL	UCART1	656753.42	4195049.93	8.6995e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	8	ALL	UCART1	656803.42	4195049.93	8.7897e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	9	ALL	UCART1	656853.42	4195049.93	8.8811e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	10	ALL	UCART1	656903.42	4195049.93	8.9843e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	11	ALL	UCART1	656953.42	4195049.93	9.1055e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	12	ALL	UCART1	657003.42	4195049.93	9.2530e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	13	ALL	UCART1	657053.42	4195049.93	9.4306e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	14	ALL	UCART1	657103.42	4195049.93	9.6389e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	15	ALL	UCART1	657153.42	4195049.93	9.8799e-08	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	16	ALL	UCART1	657203.42	4195049.93	1.0148e-07	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	17	ALL	UCART1	657253.42	4195049.93	1.0440e-07	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	18	ALL	UCART1	657303.42	4195049.93	1.0758e-07	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	19	ALL	UCART1	657353.42	4195049.93	1.1103e-07	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	20	ALL	UCART1	657403.42	4195049.93	1.1479e-07	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	21	ALL	UCART1	657453.42	4195049.93	1.1883e-07	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	22	ALL	UCART1	657503.42	4195049.93	1.2307e-07	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	23	ALL	UCART1	657553.42	4195049.93	1.2732e-07	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	24	ALL	UCART1	657603.42	4195049.93	1.3142e-07	70YrCancerDerived_InhSoilDermMMilk_FAH16to70
	25	ALL	UCART1	657653.42	4195049.93	1.3513e-07	70YrCancerDerived_InhSoilDermMMilk_FAH16to70

APPENDIX D

AIR QUALITY IMPROVEMENT MEASURES

The Applicant proposes the following measures to be added to the Archtown First Industrial Mitigated Negative Declaration (MND) as a new Appendix F. These measures exceed the existing mitigation measures and will be implemented by the City of Stockton prior to the applicable construction phase.

Prior to Operation of Tenant/On-Going

1. **(Prior to Operation/Ongoing)** If agreeable by future tenants with more than 100 Employees per shift, tenant improvement plans shall be submitted for review and approval by Community Development Department to verify the incorporation of changing/shower facilities for building occupants to encourage and facilitate bicycle commuting, pursuant to Section A5.106.4.3 of the California Green Building Code Standards, voluntary measures. If applicable, these changing/shower facilities shall be installed and functional, prior to final tenant occupancy. The Applicant will include a reference to the recommendation in the project CC&Rs for future tenants to review, prior to tenant improvement approval by the City of Stockton.
2. (**Prior to Operation/Ongoing**) All heavy-duty trucks used for dirt and material hauling during construction shall meet current CARB regulations and Include such specifications in construction documents and implement them throughout construction.
3. (**Prior to Operation/Ongoing**) Construction contracts shall require compliance with all applicable air quality regulations. Include these specifications in construction documents.
4. (**Prior to Operation/Ongoing**) All site operations shall comply with applicable air quality regulations. Include these restrictions through tenant leases or in recorded covenants.
5. (**Prior to Operation/Ongoing**) During construction, electric-powered, battery-powered, natural gas, or hybrid off-road construction equipment will be utilized where available to assist in on-going onsite operations. If substantial evidence is provided by the permittee or its contractor that such equipment is not commercially available, including a description of commercially reasonable efforts to secure such equipment, off-road diesel-powered construction equipment greater than 50 horsepower will meet USEPA Tier 4 off-road emission standards. Further, all permanent onsite generators shall be alternative- powered and/or electric or battery-powered, natural gas-powered or hybrid. The permittee shall ensure that this condition is incorporated into its general construction contract and that the general contractor will incorporate this condition in all relevant sub-contracts. Provide specifications in construction plans and, in the contract, or contract specifications.
6. (**Prior to Operation/Ongoing**) All off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction shall be electric-powered, provided that it is commercially available, which may be plug-in or battery.
7. (**Prior to Operation/Ongoing**) The Applicant/Owner shall include written information regarding CARB's proposed ACT Rule and the Clean Truck Programs as exhibits to the project CC&Rs or all tenant leases.
8. (**Prior to Operation/Ongoing**) To further promote alternative fuels and help support clean truck fleets, tenants shall be provided with written information that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. Tenants will also be provided with written information about the availability of (1) alternatively fueled cargo handling equipment; (2) grant programs for diesel-fueled vehicle engine retrofit and/or replacement; (3) designated truck parking locations in the project vicinity; (4) access to alternative fueling stations proximate to the site that supply alternative fuels, including but not limited to, compressed natural gas, hydrogen, and electricity; and (5) the US Environmental Protection Agency's SmartWay program. The Applicant/Owner shall ensure that its Tenant leases include a signed acknowledgment by the lessee that it has received and

reviewed the written information provided pursuant to this condition. Provide the specified data to tenants. The Applicant shall include these measures in the CC&Rs as recommendations or guidelines.

9. (**Prior to Operation/Ongoing**) All construction equipment, trucks, and vehicles during construction and project operations shall be limited to idling onsite for no longer than five minutes. This shall be reinforced by signage on the property and included in the CC&Rs.
10. (**Ongoing**) The Applicant, developer and/or successors-in-interest (ADS) for the project shall retain a qualified professional to prepare a detailed plan for implementation of the Air Quality Improvement Measures described in Appendix F of the certified MND for the Archtown First Industrial Annexation Project. The Plan shall consider the range of anticipated tenants and feasible means for implementation of the measures based on substantial evidence. Substantial evidence may include records of commercially reasonable efforts to obtain the required equipment or evidence that the use of such equipment is not commercially available or financially feasible and shall describe the ADS' alternative efforts to achieve the objective of the measure.

    Upon request by the City, the ODS shall submit the Plan to the Stockton Community Development Department (hereafter "City") every three years from the effective date of the City approval. The Plan shall consider the existing tenants, substantial evidence for adherence to air quality improvement measures included in the Appendix F of the certified MND, and identification and reasoning for any measure not fully adhered to due to hardship or financial infeasibility. The City is responsible for acceptance and enforcement of the monitoring Plan; however, a copy of the Plan will be made available by the City if requested by the responsible and trustee agencies involved in the original environmental analysis approved with the Project MND.
11. (**Prior to Operation/Ongoing**) Tenants within the project site shall be subject to the following requirements:
    a. Tenants with 100 or more employees shall prepare a Trip Reduction Plan providing information on transit and ridesharing in compliance with SJVAPCD Rule 9410.
    b. Tenants with 100 or more employees shall provide onsite meal options such as break rooms, food trucks.
    c. All tenant-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025.
    d. Tenants shall utilize electric-powered or zero-emission forklifts, tuggers, and other off-road mobile equipment to the degree feasible. The developer will provide infrastructure for the tenant to install charging stations for yard equipment.
    e. Tenants shall use zero-emission light - and medium-duty vehicles to the degree feasible.
    f. The developer will provide signage at entrances indicating that truck operators shall turn off engines when not in use and observe State idling requirements.
    g. Provide electric truck charging stations at dock doors proportional to demand.
    h. Provide electric TRU electrical connections at dock doors proportional to demand.
    i. Provide electric light vehicle charging stations per code requirements and proportional to demand.
    j. The proposed building will be solar-adaptable per code requirements.
    k. Standby generators fuel systems shall be non-diesel where feasible.

l. The CC&R's shall recommend tenants to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
m. Comply with applicable Stockton Building Codes, greenhouse gas reduction requirements, and energy conservation standards.
n. Provide exit signage, directing trucks to truck routes.
o. The CC&R's shall recommend staff training in pollution control requirements and related record-keeping.
p. The CC&R's shall include information related to the availability of incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade truck fleets.
q. The CC&R's shall make specific reference to air quality improvement measures promoting the use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration technologies, such as the above measures "g," "h" and "i.".
r. The CC&R's shall advise tenants of various applicable State emission control requirements.

Should effectuation of these measures create a hardship due to lack of adequate equipment or if financially infeasible due to market constraints, the permittee or its contractor shall provide substantial evidence that such equipment is not commercially available or the improvement are not financially feasible and include an alternative effort to achieve the desired result of the measure.

12. (**Prior to Operation/Ongoing**) The Applicant shall provide tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade truck fleets.

Design/Pre-Construction

13. (**Site Plan Review**) The Applicant will provide conduits to primary dock locations for future EV truck charging and/or other electric back up support. Proposed buildings will be solar-adaptable as per the above measure "1-j.".
14. **(Site Plan Review**) The Applicant will install EV-ready conduits and charging station locations as required in the City of Stockton Building Code.
15. **(Site Plan Review**) Signage on both sites shall meet the following standards:
    a. Entry and exit points are clearly designated.
    b. Truck parking and maintenance activity is confined to the project site and is not allowed on nearby public streets.
16. **(Site Plan and Design Review**) To assist in countywide efforts to divert recyclable wastes from landfill disposal that can produce greenhouse gases when the wastes decompose, throughout the operating life of the project, the property owner shall provide both recycling bins and trash bins in all trash enclosures, as available by the local waste hauling company, to assist with the separation of recyclables and trash.
17. **(Design Review**) The project shall be designed, constructed in accordance with LEED green building certification standards. Include such specifications in construction documents. Construct accordingly.

Grading/Construction

18. **(Note on Plans and Ongoing)** The construction contractor shall:

a. Water a minimum of three times daily to control dust during any activities that generate dust,
b. Apply chemical soil stabilizers on inactive areas (i.e., disturbed areas within the site that are unused for four consecutive days) during grading operations,
c. Suspend any dust-generating operations when wind speeds exceed 25 miles per hour,
d. At least once a day during ground-disturbing activities operate PM10-efficient street sweepers or roadway- washing trucks on adjacent roadways to remove dirt dropped by construction vehicles or dried mud carried off by trucks moving or bringing materials, and Schedule construction activities in accordance with specific San Joaquin County Air Quality Management District (AQMD) directives.

19. (**Prior to the issuance of grading or building permits and On-Going**) The permittee/applicant shall provide verification that construction specifications establish a five-minute idling limit for all heavy-duty construction equipment utilized during construction of the proposed project. Signage shall be posted throughout the construction site regarding the idling time limit, and the construction contractor shall maintain a log for review by City inspectors. The log shall verify that construction equipment operators are advised of the idling time limit at the start of each construction day. Note idling limits in construction specifications. Maintenance of logs required.
20. (**Prior to the issuance of the building permit)** The permittee/applicant shall provide a cool roof specifications in construction plans verifying specifications for the proposed warehouse roof would utilize cool roofing materials with an aged reflectance and thermal emittance values that are equal to or greater than those specified in the 2016 CALGreen Building Standards Table A5.106.11.2.2 for Tier 1 and the City's Green Building Standards within Chapter 15.72 of the Stockton Municipal Code.
21. **(Prior to the issuance of the building permit)** Proposed building plans will include electrical system features that will encourage use of electrically powered landscaping equipment, such as lawnmowers and leaf blowers.
22. (**Prior to issuance of a Certificate of Occupancy**) The permittee/applicant shall provide verification that tenant leases or covenants recorded with any future ownership changes shall require all off-road equipment (non-street legal), such as forklifts and street sweepers, that are used onsite during project operations to be powered by alternative fuels, electrical batteries or other non-diesel fuels (e.g., propane) that do not result in diesel particulate emissions and result in low or zero emissions. Include these restrictions through tenant leases or in recorded covenants.
23. (**Prior to issuance of a Certificate of Occupancy**) Building contractors for the project shall be subject to the following requirements:
    a. Haul trucks and large onsite diesel equipment shall be equipped with CARB Tier IV-compliant engines or better, if available.
    b. Small equipment shall be electric or low-emission, where feasible.
    c. Off-road diesel-powered equipment shall not be left in the "on position" for more than 10 hours per day.
    d. Provide temporary electrical hookup to the construction yard and associated work areas.
    e. Prepare and implement a Dust Control Plan approved by the APCD with robust watering requirements.
    f. Prohibit the idling of heavy equipment for more than 5 minutes.
    g. Maintain on the construction site an inventory of construction equipment, maintenance records, and datasheets, including design specifications and emission control tier classifications.

h. Participate in City mitigation monitoring efforts as required.
i. Comply with SJVAPCD Rule 4601, limiting VOCs in architectural coatings.