STANISLAUS COUNTY PLANNING COMMISSION

May 1, 2025

STAFF REPORT

REZONE APPLICATION NO. PLN2023-0093
U-HAUL

REQUEST: REQUEST TO REZONE TWO PARCELS TOTALING 8.57± ACRES FROM PLANNED DEVELOPMENT (P-D) (254) AND GENERAL AGRICULTURE (A-2-10) TO A NEW P-D, TO ALLOW FOR DEVELOPMENT OF A MINI-STORAGE AND MOVING VEHICLE RENTAL FACILITY.

APPLICATION INFORMATION

Applicant:	U-Haul (Chris Trudell)
Property owner:	Amerco Real Estate Company (Matt Braccia, Chris Trudell)
Agent:	N/A
Location:	4843 McHenry Avenue (State Route [SR] 108), between Kiernan Avenue (SR 219) and Bangs Avenue, in the Modesto area.
Section, Township, Range:	5-3-9
Supervisorial District:	District Four (Supervisor Grewal)
Assessor's Parcel:	046-010-016 and 046-010-024
Referrals:	See Exhibit I Environmental Review Referrals
Area of Parcel(s):	8.57± acres
Water Supply:	City of Modesto
Sewage Disposal:	Private septic system
General Plan Designation:	Planned Development and Planned Industrial
Community Plan Designation:	N/A
Existing Zoning:	Planned Development (P-D) (254) and General Agriculture (A-2-10)
Sphere of Influence:	City of Modesto
Williamson Act Contract No.:	N/A
Environmental Review:	Negative Declaration
Present Land Use:	One single family dwelling and accessory structure, an unpermitted car sales lot, and a stormwater drainage basin.
Surrounding Land Use:	Light industrial warehouses and retail commercial uses in all directions; an apartment complex, a cardroom, vacant commercial parcels, and Kiernan Avenue (State Route 219) to the north; vacant commercial parcels, auto dealerships, and the City of Modesto to the south; and McHenry Avenue (State Route 108), a steel fabricator, irrigated orchard, and auto dealerships to the east.

RECOMMENDATION

Staff recommends the Planning Commission provide a recommendation of approval to the Board of Supervisors, based on the discussion below and on the whole of the record provided to the County. Exhibit A provides an overview of the findings and actions required for project approval.

PROJECT DESCRIPTION

This project is a request to rezone two parcels totaling 8.57± acres from Planned Development (P-D) (254) and General Agriculture (A-2-10) to a new P-D in order to allow for development of a U-Haul facility which will offer mini-storage and the rental of vehicles, equipment, and storage containers. The project proposes to pave the 8.57± acre site and construct the following structures:

- A 18,634± square-foot single-story building with a truck loading dock for indoor storage of approximately 1,620 rentable portable moving containers;

- A 126,352± square-foot four-story building (31,588± square-foot footprint), with 1,138 indoor-accessible self-storage units, a 2,483± square-foot ground-floor show room, 1,460± square-foot retail sales area, and three vehicle unloading bays; and

- Nine structures totaling 21,900± square-feet divided into a total of 156 exterior-accessible mini-storage units.

Additionally, the project proposes to pave the entire site and develop 10 customer vehicle parking stalls and 15 parking stalls for display of a variety of moving vehicles available to customers for rent. The applicant proposes to install approximately 33,425± square feet of landscaping, consisting of a mix of trees, shrubs, and groundcover, located along the road frontages and alongside the proposed buildings. The balance of the asphalt area will be used for the storage of a mix of pick-up trucks, cargo vans, moving trucks ranging from 10-feet to 26-feet, as well as trailers and towing equipment available for rent. Light poles are proposed to be installed within the parking lot. Wall-mounted signage is proposed on the buildings with no monument signage proposed. Chain-link fencing is proposed to be installed along property lines which adjoin adjacent parcels. The mini-storage units will be available for rent for storage of various materials; however, no on-site hazardous storage of flammables, chemicals or paints is proposed or permitted per U-Haul policy. Construction is proposed to begin by April 2026 and will develop in one phase.

The facility proposes to be open seven days per week, year-round, with daily hours of operation from 7:00 a.m. to 7:00 p.m., with the exception of operating hours between 7:00 a.m. to 8:00 p.m. on Fridays and 9:00 a.m. to 5:00 p.m. on Sundays. The facility anticipates a maximum of 15 employees on a peak shift, 10 employees on a minimum shift, and 10 customers at peak times. Up to four truck deliveries/loadings are proposed per-day. The overall daily vehicle trips are proposed to be 31 daily trips, and 53 daily weekend trips.

The facility proposes to replace the site's existing 35-foot-wide driveway onto Kiernan Avenue (State Route [SR] 219) with a new driveway, 62-feet-wide, with exclusively right-in/right-out

movements, along the SR 219 frontage. The facility also proposes to take access off McHenry Avenue (SR 108) via a new single 40-foot-wide driveway. There is an existing California Department of Transportation (Caltrans) stormwater drainage basin on the western edge of the project site, located on Assessor Parcel Number (APN) 046-010-024, which provides drainage for SR 219 road facilities (see Exhibit B-4 – *Maps Site Plan, and Elevations*). The applicant proposes to relocate and enlarge the basin further south onto APN 046-010-016 to handle stormwater runoff for the proposed development. The project will be required to connect to the City of Modesto for water service and proposes to be served by a private on-site wastewater treatment system; however, the site will be required to connect to City of Modesto's sewer lines at such a time that they become available for use.

The southern parcel included in the project site (APN 046-010-024) is zoned P-D (254), which was approved by the Board of Supervisors on April 10, 2001 under Rezone No. 2000-17 – *Koenig* to allow development of a mini-storage facility; the parcel never developed leading to the zoning expiring. The northern parcel included in the project site is zoned General Agriculture (A-2-10) (APN 046-010-016) which does not permit the proposed use. Consequently, a rezone is required to develop both project parcels the mini-storage and moving equipment rental facility (see Exhibit B-4 – *Maps Site Plan, and Elevations*.)

SITE DESCRIPTION

The 8.57± acre project site consists of two parcels (APNs 046-010-016 and 046-010-024) and is located at 4843 McHenry Avenue (SR 108), between Kiernan Avenue (SR 219) and Bangs Avenue, within the Local Agency Formation Commission (LAFCO) adopted Sphere of Influence (SOI) of the City of Modesto (see Exhibit B – *Maps, Site Plan, and Elevations*). The project site is improved with one single family dwelling, a detached two-car garage, an unpermitted car sales lot for use by Roberts Auto Sales, currently operating on the parcel to the south (APN 046-010-017), and a stormwater drainage basin serving Caltrans facilities. A map of adjacent parcels and their respective APNs is provided in Exhibit B-4.

There are several existing easements on the property, including a 10-foot-wide public utility easement along the SR 219 road frontage and a 10-foot wide storm drain basin easement which runs from SR 219 along the western edge of the project site ending at the Caltrans storm drainage basin. There is an additional 25-foot wide public utility and access easement which extends from the southern property line of APN 046-010-024 through an existing driveway located on the adjoining parcels to the east, currently developed with a flooring sales business, gas station and a fast-food restaurant, which provides access to SR 219. This easement is proposed to be maintained to provide access between the adjoining developments but will need to be modified to address the relocated driveway. There is also a 10-foot-wide Modesto Irrigation District (MID) irrigation easement containing abandoned-in-place MID facilities running through APN 046-010-024, which is proposed to be quitclaimed.

The project site is surrounded by light industrial warehouses and retail commercial uses in all directions; an apartment complex, a cardroom, vacant commercial parcels, and Kiernan Avenue (SR 219) to the north; vacant commercial parcels, auto dealerships, and the City of Modesto to the south; and McHenry Avenue (SR 108), a steel fabricator, irrigated orchard, and auto dealerships to the east.

ISSUES

A letter was received in response to the project's Initial Study from Stacey Wellnitz of Commercial Architecture, on behalf of Robert's Auto Sales' who operates an auto sales business south of the project site (see Exhibit G – *Correspondence, dated April 8, 2024*). Robert's Auto Sales is currently operating on four separate parcels (APNs 046-010-016 through -019) (see Exhibit B-4); the auto dealership has land use authority to operate on APNs 046-010-018 and -019 but has expanded onto APN 046-010-017 and APN 046-010-016, which is the southern parcel included in the current project request, without first obtaining the land use authority to do so. The existing dwelling on the project site was illegally converted to an office and a 1.75± acre area surrounding the dwelling was paved and is currently being utilized for vehicle display and sales associated with Robert's Auto Sales; this use is proposed to be abandoned on the project site as part of the proposed project.

Ms. Wellnitz's letter expresses concern over the current site plan's conceptual depiction of a planned extension of Spyres Way which continues running north through Robert's Auto Sales (APN 046-010-017) terminating into a future cul-de-sac located on the south property line of the project site (APN 046-010-016) (see Exhibit B-4). Right-of-way dedications were provided for the future extension of Spyres Way through APN 046-010-017 under a previously recorded Parcel Map No. 39-PM-12 (see Exhibit H - *Recorded Parcel Map No. 39-PM-12*). While buildout of the proposed project will require submittal and approval of improvement plans for developing the portion of the future Spyres Way cul-de-sac located on the project parcels pursuant to Development Standard No. 20, this extension will not be built-out until such a time as the appropriate right-of-way dedications and improvement plans are provided by all parcels affected by the future right-of-way. The letter requests that the record reflect that this extension and cul-de-sac located on APN 046-010-017 be clearly reflected as "future", and that installation of the roadway at this time would be premature and potentially impact the future development potential of their property.

The letter also requests that the applicant be made aware of potential right-of-way-dedications and impacts resulting from buildout of the future North County Corridor (NCC) and identifies that planning documents presently show planned rights-of-way impacting the proposed layout of APN 046-010-024. The NCC, which is a planned 18-mile realignment of SR 108 around the Modesto, Riverbank, and Oakdale communities, includes widening and realignment of the portion of Kiernan Avenue (SR 219) adjacent to the project site as part of its Phase Four of development. Currently, Phase One has just begun construction and is estimated to be completed in 2028. The portions of the NCC that include the project site is included in Phase Four, which has only been conceptually designed. The conceptual design for Phase Four depicts long frontage roads running parallel on both sides of Kiernan Avenue, which bisect the project site and planned structures and end in a cul-de-sac located fully on the project site. The applicant has been made aware that the NCC will restrict access from the north property line at such a time the NCC develops; however, Public Works was consulted during review of the project and indicated that the Spyres Way extension was identified as a suitable alternative to maintain secondary access to the project site upon development of Phase Four of the NCC. Accordingly, right-of-way dedications are not needed to accommodate the NCC, outside of those requested in Development Standard No. 20 to accommodate the planned Spyres Way extension.

No other issues have been identified as a part of this request. Standards development standards have been added to the project.

GENERAL PLAN CONSISTENCY

The parcel identified as APN 046-010-024 is currently designated Planned Development in the Land Use Element of the Stanislaus County General Plan, and APN 046-010-016 is designated as Planned Industrial. The General Plan identifies the intent of the Planned Development designation as being for lands which, because of demonstrably unique characteristic, may be suitable for a variety of uses without detrimental effects on other properties. The General Plan further identifies freeway interchange and frontage roads adjacent to major highways and freeways as appropriate locations for planned developments. Similarly, the intent of the Planned Industrial designation is to provide suitable locations for light industrial development, in areas with public sewer and/or water. The Planned Industrial designation is preferred to an Industrial designation as it allows for more control of development standards to reduce impacts to adjoining properties. A Planned Development (P-D) zoning designation allows for the flexibility to provide a variety of uses and development standards, while retaining consistency with the General Plan as a whole. Additionally, the proposed P-D zoning is consistent with both the existing Planning Industrial and Planned Development zoning districts.

The project site is located with the LAFCO adopted SOI of the City of Modesto. The County's General Plan SOI policy states that development, other than agricultural uses and churches, which requires discretionary approval from incorporated cities, shall be referred to the city for preliminary approval. The project shall not be approved by the County unless written communication is received from the city memorializing their approval. If approved by the city, the city should specify what development standards are necessary to ensure that development will comply with city development standards. Goal Five, Policy 26 of the Land Use Element states that development must meet the applicable development standards of the affected city. Approval from a city does not preclude the County's decision-making bodies from exercising discretion, and they may either approve or deny the project. Additionally, discretionary projects within the SOI of a sanitary sewer district, domestic water district, or community services district, shall be forwarded to the district board for comment regarding the ability of the district to provide services. In this case, the City of Modesto also provides sewer and water service in the area. The City of Modesto has reviewed the project request and provided written support for the project. Development standards requiring a lot merger, dedication of a sewer easement for the purpose of sewer main installation and access when sewer becomes available, and installation of a 12-inch waterline in Kiernan Avenue as a condition to obtain water service were requested by City of Modesto staff and have been added to the project's development standards. Although not requested, City standards for landscaping, parking, lighting, and signage have also been applied as development standards due to the project being located within the City's SOI.

Staff believes that the proposed project is consistent with the General Plan policies discussed above. The site is surrounded by commercial development in all directions. Approval of this project would result in a development consistent with the surrounding area. As such, staff believes this use can be determined by the County to be consistent with the Stanislaus County General Plan.

ZONING ORDINANCE CONSISTENCY

The site is currently zoned General Agriculture (A-2-10) and P-D (254). The A-2-10 zoning does not permit the proposed development, and P-D (254) was approved to permit the development of a mini storage facility; however, the portion of the project site under the P-D zoning never developed in accordance with the approved development plan, and accordingly, the zoning has expired. A rezone is required in order to approve development of the project site.

Requirements that signage, landscaping, parking, and lighting meet City of Modesto standards have been incorporated into the development standards for this rezone. This project will maintain zoning consistency by adhering to the uses and development standards incorporated into this project (see Exhibit C – *Development Standards*).

ENVIRONMENTAL REVIEW

An environmental assessment for the project has been prepared in accordance with the California Environmental Quality Act (CEQA). Pursuant to CEQA, an Initial Study was prepared and circulated from March 5, 2025 to April 9, 2025, and was referred to interested parties and responsible agencies for review and comment (see Exhibit E – *Initial Study, with Attachments* and Exhibit I – *Environmental Review Referrals*).

A comment was received from the San Joaquin Valley Air Pollution Control District (Air District) in response to the proposed project indicating that construction and operation-related emissions for the project would have a less than significant impact on air quality and are not expected to exceed any of the Air District's annual emissions significant thresholds, but also requested that emissions generated by the proposed project be further studied via a California Emission Estimator Model (CalEEMod) analysis and Health Risk Assessment (HRA) to evaluate the project's health-related impacts. Additionally, the Air District requested that an Ambient Air Quality Analysis (AAQA) be included if emissions of any pollutant exceeds 100 pounds per day.

A HRA was performed by Terracon Consultant, Inc. to study health-related impacts of the proposed project. Emissions were examined specifically for emissions and toxic air contaminants resulting from both construction activities and operations, including both mobile sources (e.g. vehicle traffic) and stationary sources. The results of the HRA indicated the project's cancer risk and chronic risk would be less than significant (see Attachment I of Exhibit E – *Initial Study, with Attachments*). Additionally, the results did not exceed 100 pounds per day and accordingly, an AAQA was not required. The Air District reviewed the analysis and provided a response in agreement with its findings.

No significant issues were raised in response to the Initial Study; accordingly, a Negative Declaration has been prepared for approval prior to action on the project itself as the project will not have a significant effect on the environment (see Exhibit F – *Negative Declaration*). Development standards reflecting referral responses have been placed on the project (see Exhibit C – *Development Standards*).

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Note: Pursuant to California Fish and Game Code Section 711.4, all project applicants subject to the California Environmental Quality Act (CEQA) shall pay a filing fee for each project; therefore, the applicant will further be required to pay **$3,025.75** for the California Department of Fish and Wildlife (formerly the Department of Fish and Game) and the Clerk-Recorder filing fees. The attached development standards ensure that this will occur.

Contact Person: Kristen Anaya, Senior Planner, (209) 525-6330

Attachments:

Exhibit A - Findings and Actions Required for Project Approval
Exhibit B - Maps, Site Plan, and Elevations
Exhibit C - Development Standards
Exhibit D - Development Schedule
Exhibit E - Initial Study, with Attachments
Exhibit F - Negative Declaration
Exhibit G - Correspondence, dated April 8, 2024
Exhibit H - Recorded Parcel Map No. 39-PM-12
Exhibit I - Environmental Review Referrals
Exhibit J - Levine Act Disclosure Statement

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Findings and Actions Required for Project Approval

1. Adopt the Negative Declaration pursuant to CEQA Guidelines Section 15074(b), by finding that on the basis of the whole record, including the Initial Study and any comments received, that there is no substantial evidence the project will have a significant effect on the environment and that the Negative Declaration reflects Stanislaus County's independent judgment and analysis.

2. Order the filing of a Notice of Determination with the Stanislaus County Clerk-Recorder pursuant to Public Resources Code Section 21152 and CEQA Guidelines Section 15075.

3. Find that:

    a. The project is consistent with the overall goals and policies of the County General Plan.

    b. The proposed Planned Development zoning is consistent with the Planned Development and Planned Industrial General Plan designation.

    c. The project will increase activities in and around the project area, and increase demands for roads and services, thereby requiring dedication and improvements.

4. Approve Rezone Application No. PLN2023-0093 – U-Haul, subject to the attached Development Standards and Development Schedule.

5. Introduce, waive the reading, and adopt an ordinance for the approved Rezone Application No. PLN2023-0093 – U-Haul.

U-HAUL

REZ PLN2023-0093

AREA MAP

EXHIBIT B

U-HAUL

REZ PLN2023-0093

GENERAL PLAN MAP

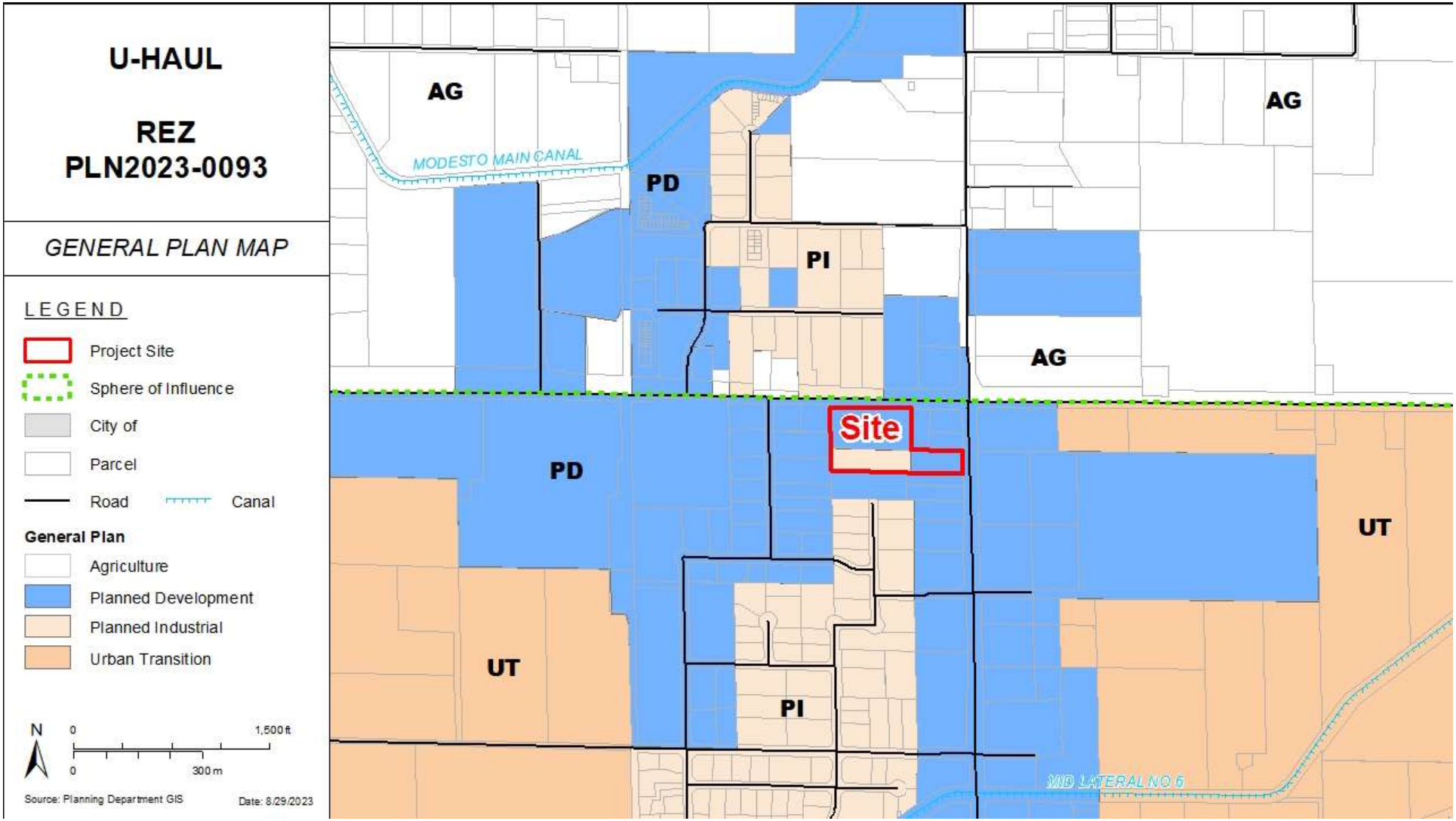


EXHIBIT B-1

U-HAUL

REZ PLN2023-0093

ZONING MAP

LEGEND

- Project Site
- Sphere of Influence
- City of
- Parcel
- Road
- Canal

Zoning Designation

- General Agriculture 10 Acre
- General Agriculture 40 Acre
- Planned Development
- Planned Industrial

N 0 1,500 ft 0 300 m

Source: Planning Department GIS Date: 8/30/2023

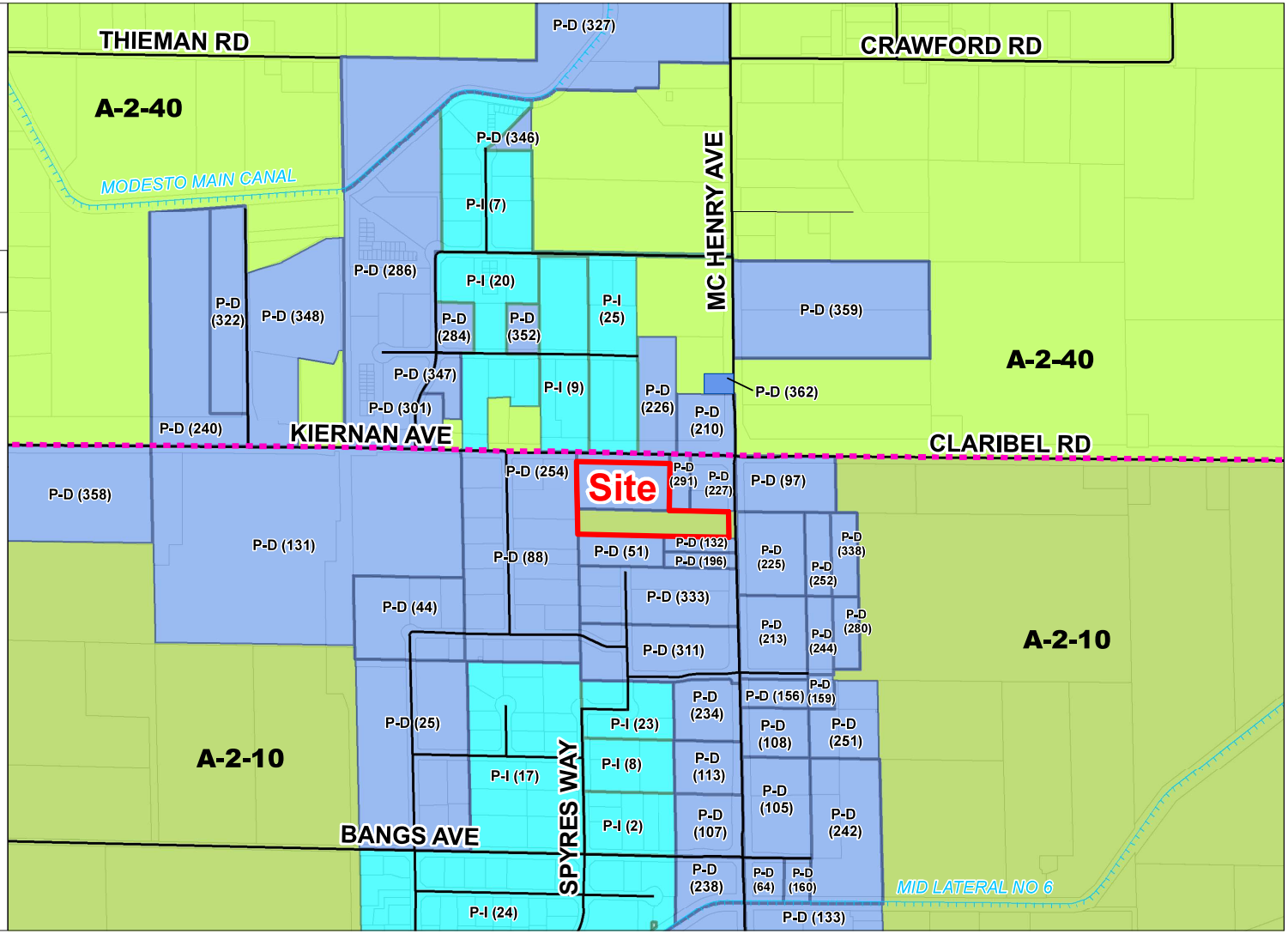
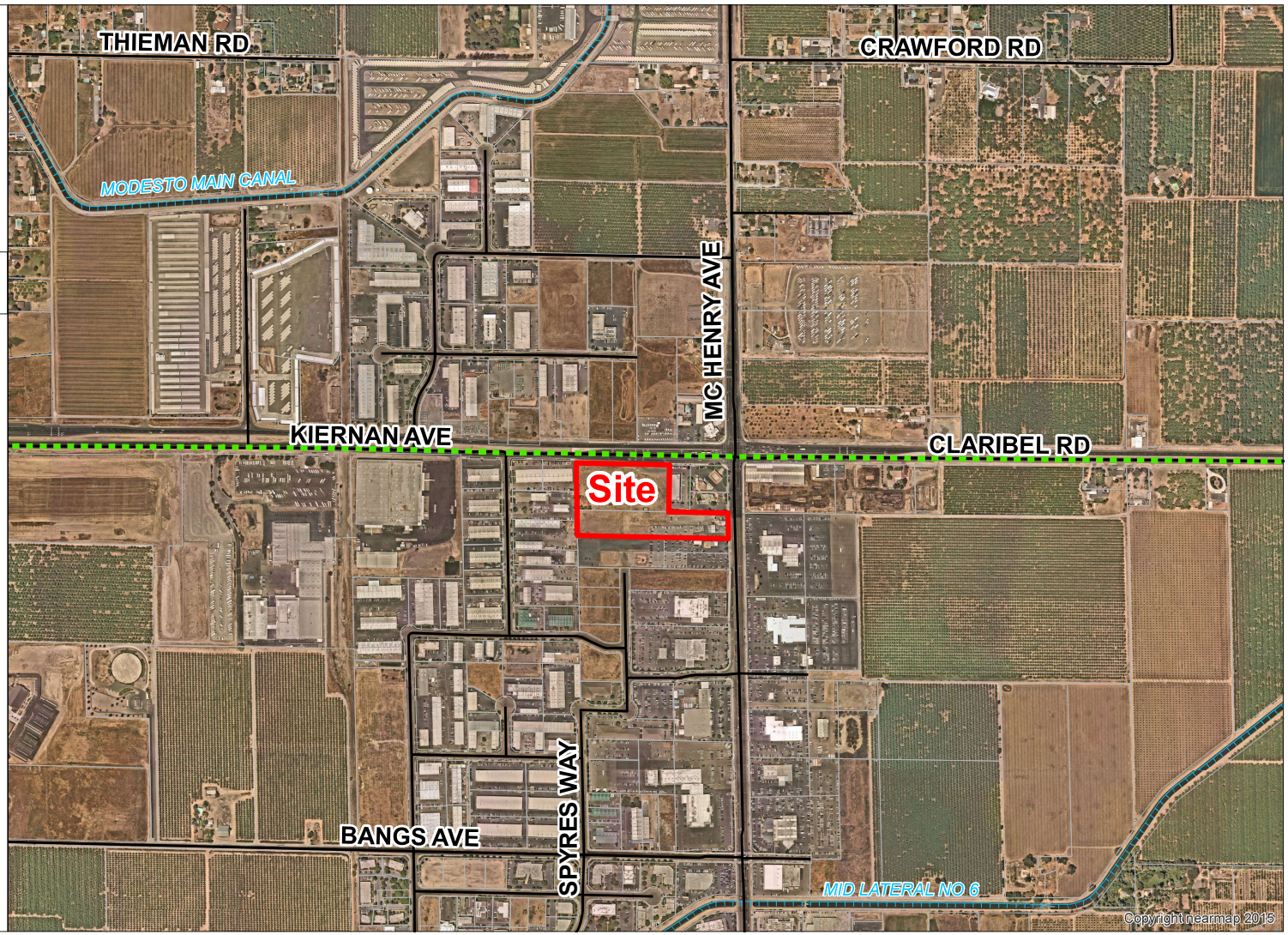


EXHIBIT B-2

U-HAUL

REZ PLN2023-0093

2023 AERIAL AREA MAP



LEGEND

- Project Site
- Sphere of Influence
- Road
- Canal

N 0 1,500 ft 0 300 m

Source: Planning Department GIS Date: 8/29/2023

12

EXHIBIT B-3

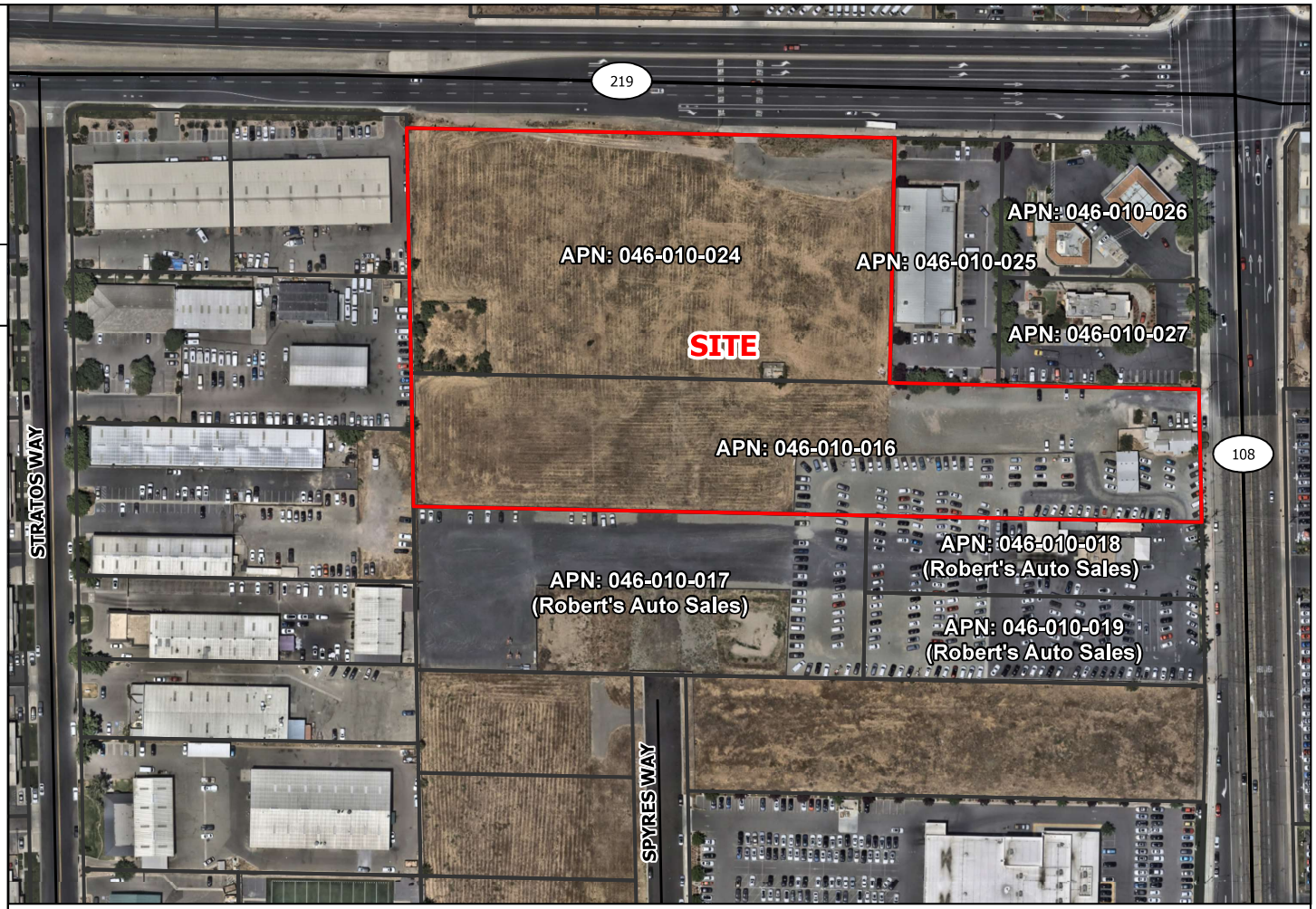
U-HAUL

REZ
PLN2023-0093

ASSESSOR PARCEL NUMBER

LEGEND

- Project Site
- Parcel
- Highway
- Street



N

0 140 280 Feet

0 35 70 Meters

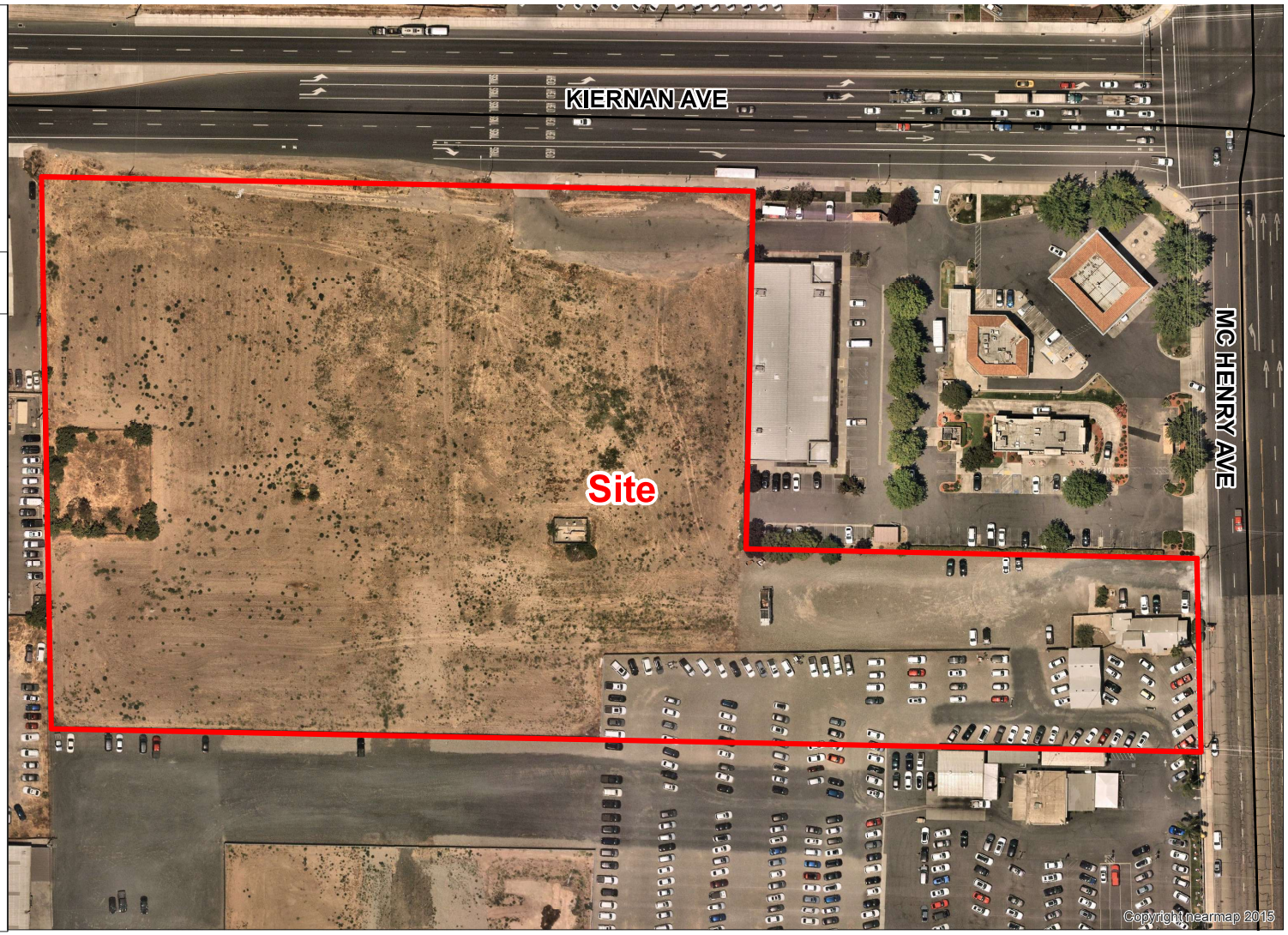
Source: Planning Department GIS Date Exported: 4/22/2025

EXHIBIT B-4

U-HAUL

REZ
PLN2023-0093

2023 AERIAL SITE MAP



LEGEND

Project Site

Road

N

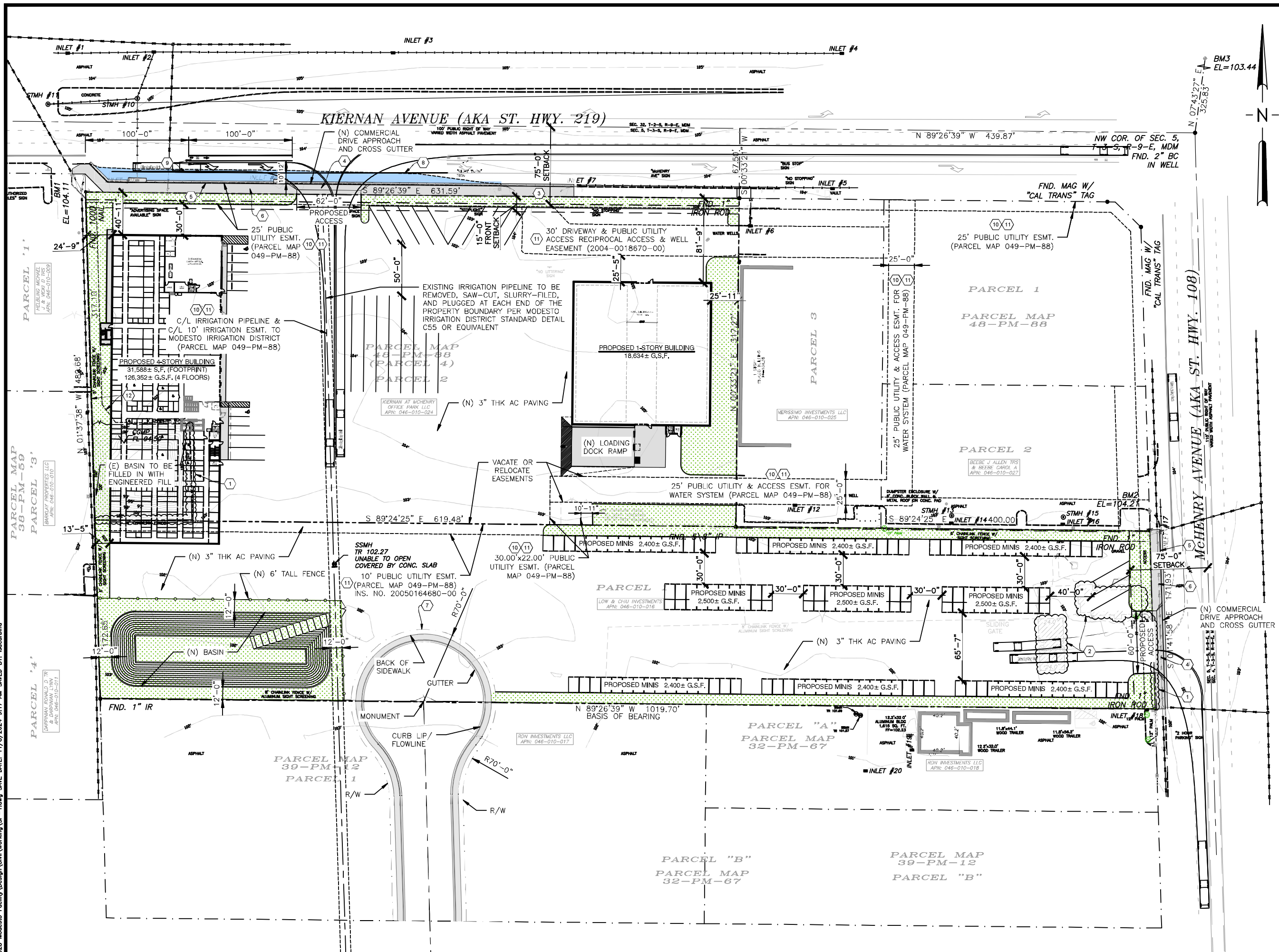
0 200 ft

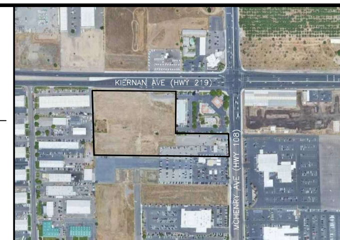
0 50 m

Source: Planning Department GIS

Date: 8/29/2023

EXHIBIT B-5





VICINITY MAP SCALE: N.T.S.

ZONING INFORMATION

PROJECT NAME: U-HAUL MOVING & STORAGE OF MODESTO

MUNICIPALITY: STANISLAUS COUNTY

PROJECT ADDRESS: KIERNAN AVENUE & MCHENRY AVENUE
MODESTO, CA

APN /ACRE / AREA: PARCEL 1: 046-010-024 (4.55 AC)
PARCEL 2: 046-010-016 (4.02 AC)
TOTAL: 373,839 SF

CURRENT ZONE: PARCEL 1: PD-254 (PLANNED DEVELOPMENT)
PARCEL 2 A-2-10 (AGRICULTURE DISTRICT)

REZONE: PD (PLANNED DEVELOPMENT)

ADJACENT ZONING:
N: PI, PD
S: PD
E: PD
W: PD

USES: SELF-STORAGE
TRUCK & TRAILER SHARING AND RELATED RETAIL SALES

BULK REQUIREMENTS - (BASED ON C-2 ZONE)

SETBACKS:
MAJOR STREET: 75 FT (MIN) FROM CENTERLINE OR 15 FT (MIN) FROM PLANNED STREET LINE WHICHEVER IS GREATER
MINOR STREET: 45 FT (MIN) FROM CENTERLINE OR 15 FT (MIN) FROM PLANNED STREET LINE WHICHEVER IS GREATER
SIDE YARD: NONE, 5 FT (MIN) NEXT TO RESIDENTIAL
REAR YARD: NONE, 5 FT (MIN) NEXT TO RESIDENTIAL

FAR: NONE

LOT COVERAGE: NONE

HEIGHT LIMIT: 75 FT (MAX)

PARKING:
GENERAL RETAIL = 1 SP/ 300 GFA
WAREHOUSE = 1SP/ EACH EMPLOYEE ON MAX SHIFT + 3 SPACES

LANDSCAPE:
FRONT YARD: 3% OF TOTAL LOT AREA
TOTAL SITE: 10% OF TOTAL SITE AREA 16% PROPOSED

PRELIMINARY NOT FOR CONSTRUCTION

PROPOSED MIX

LOCKER SIZE	INTERIOR															EXTERIOR MINIS			GRAND TOTAL		
	1st Flr	SQ. FT.	%	2nd Flr	SQ. FT.	%	3rd Flr	SQ. FT.	%	4th Flr	SQ. FT.	%	TOTAL	SQ. FT.	%	QTY	SQ. FT.	%	QTY	SQ. FT.	%
5 x 5	35	875	5%	48	1200	5%	48	1200	5%	48	1200	5%	179	4475	5%	0	0	0%	179	4475	4%
5 x 10	92	4600	27%	115	5750	26%	116	5800	26%	115	5750	26%	438	21,900	26%	0	0	0%	438	21,900	21%
7 x 10	3	210	1%	3	210	1%	3	210	1%	3	210	1%	12	840	1%	0	0	0%	12	840	1%
10 x 8	0	0	0%	2	160	1%	2	160	1%	2	160	0%	6	480	0%	0	0	0%	6	480	0%
10 x 10	80	8000	47%	102	10,200	45%	101	10,100	45%	102	10,200	46%	385	38,500	46%	30	3000	14%	415	41,500	39%
10 x 15	23	3450	20%	33	4,950	22%	33	4,950	22%	33	4,950	22%	122	18,300	22%	126	18,900	86%	248	37,200	35%
TOTAL	233	17,135	100%	303	22,470	100%	303	22,420	100%	303	22,470	100%	1142	84,495	100%	156	21,900	100%	1298	106,395	100%

♿ 31 ADA LOCKERS REQUIRED/PROVIDED

U-BOX AREA = 18,152± S.F.
TOTAL U-BOXES = 1,440 (288 x 5-HIGH)

LEGEND:

- PROPERTY LINE
- (N) BUILDING
- EXISTING BUILDING
- PROPOSED CONTOURS
- EXISTING CONTOURS
- OVERHEAD POWER LINE
- PARCEL LINE
- EASEMENT
- SETBACK
- (E) CHAIN LINK FENCE
- (N) CHAIN LINK FENCE
- (E) STORM DRAIN PIPELINE
- LANDSCAPING
- (N) CONCRETE
- TO BE DEMO'D
- (N) PAVEMENT
- (E) STORM DRAIN INLET

KEYNOTES:

1. DEMO (E) FENCE LINE.
2. DEMO (E) BUILDING.
3. DEMO (E) CURB RAMP.
4. (N) CONCRETE DRIVEWAY APRON AND CROSS GUTTER PER CALTRANS 2023 STANDARD PLAN A87A.
5. (N) CONCRETE CURB AND GUTTER PER DETAIL TYPE A2 CALTRANS 2023 STANDARD PLAN A87A.
6. (N) 10'-0" WIDE CONCRETE WALKWAY
7. (F) COMMERCIAL CUL-DE-SAC PER COUNTY OF STANISLAUS DEPARTMENT OF PUBLIC WORKS STANDARD PLATE NO. 3-B1. SHOWN FOR REFERENCE ONLY.
8. (N) PAVED RIGHT-SHOULDER AND STORAGE LANE TO TIE INTO EXISTING PAVEMENT PER CALTRANS 2023 STANDARDS
9. (N) PAVEMENT MARKINGS AND ARROWS PER CALTRANS 2023 STANDARDS
10. AN EASEMENT SHOWN OR DEDICATED ON THE MAP OF PARCEL MAP RECORDED JUNE 2, 1998 AND ON FILE IN BOOK 48, PAGE 88, OF PARCEL MAPS.
FOR: PUBLIC UTILITY, IRRIGATION, ACCESS FOR THE WATER SYSTEM AND INCIDENTAL PURPOSES
11. THE TERMS, PROVISION AND EASEMENT(S) CONTAINED IN THE DOCUMENT ENTITLED RECIPROCAL ACCESS, EASEMENT AND WELL AGREEMENT RECORDED FEBRUARY 10, 2004 AS INSTRUMENT NO. 2004-0018670-00 OF OFFICIAL RECORDS.
DOCUMENT(S) DECLARING MODIFICATIONS THEREOF RECORDED SEPTEMBER 19, 2006 AS INSTRUMENT NO. 20060138970-00 OF OFFICIAL RECORDS.
DOCUMENT(S) DECLARING MODIFICATIONS THEREOF RECORDED SEPTEMBER 9, 2005 AS INSTRUMENT NO. 20050164680-00 OF OFFICIAL RECORDS.
12. EASEMENT FOR DRAINAGE PURPOSES AND INCIDENTAL PURPOSES, RECORDED MAY 9, 2000 AS INSTRUMENT NO. 2000-0035819-00 OF OFFICIAL RECORDS. TO BE VACATED.

GRAPHIC SCALE
0 25' 50' 100'
(IN FEET)
1"=50'-0"

PLN2023-0093 - U-HAUL

ENGINEERING SEAL:

U-HAUL OF MODESTO
KIERNAN AVE. & McHENRY AVE.
MODESTO, CA. 95356

NO.	REVISION/ISSUE	DATE
A	ISSUED FOR REVIEW	11/08/24

PLEASE NOTE THE REVISION AND DATE ARE FOR STRUCTURAL SHEETS ONLY.

ANACAPA
ENGINEERING AND DESIGN, INC.
WWW.ANACAPA.COM
9100 MING AVE. STE. 110
BAKERSFIELD, CA. 93311

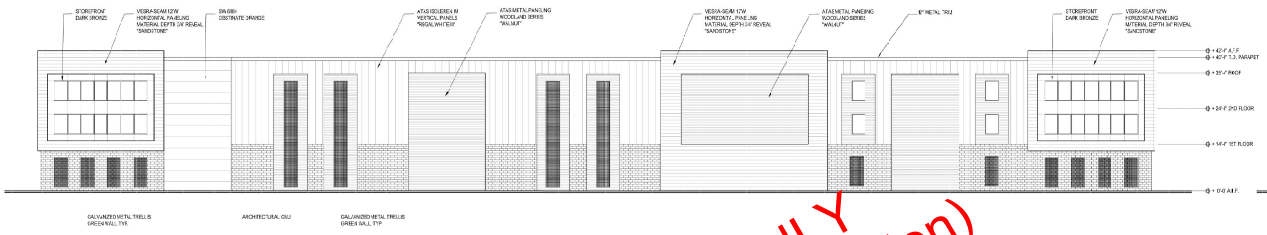
PROJECT NAME AND ADDRESS
U-HAUL OF MODESTO
KIERNAN AVE. & McHENRY AVE.
MODESTO, CA. 95356
APN: 046-010-024 & 046-010-016

SHEET DESCRIPTION
SITE PLAN

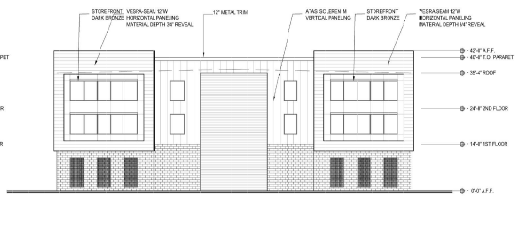
PROJECT NO. 24028
DATE 11/08/24
SCALE 1" = 50'
SHEET NO. **SP-1**

FILE LOCATION: C:\Users\isacurbina\Anacapa Dropbox\Anacapa Team\Uhaul\24028 Modesto Facility\Design\Civil\Working\SP-1.dwg SAVE DATE: 11/8/2024 9:17 AM SAVED BY: isacurbina

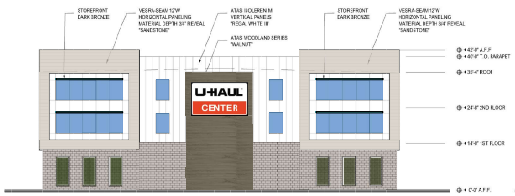
EXHIBIT B-6



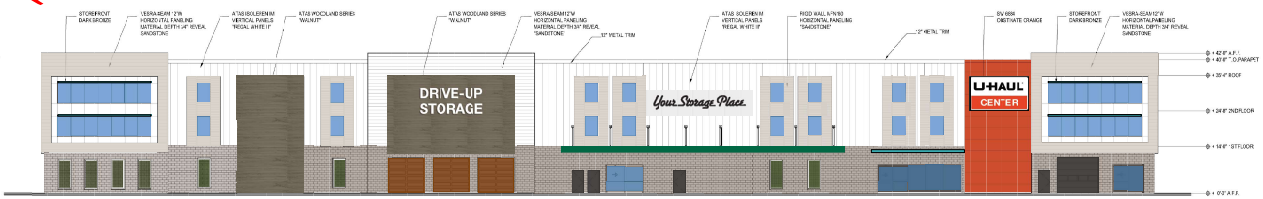
SOUTH ELEVATION
SCALE: 1/16"=1'-0"



EAST ELEVATION
SCALE: 1/16"=1'-0"



WEST ELEVATION
SCALE: 1/16"=1'-0"



NORTH ELEVATION
SCALE: 1/16"=1'-0"

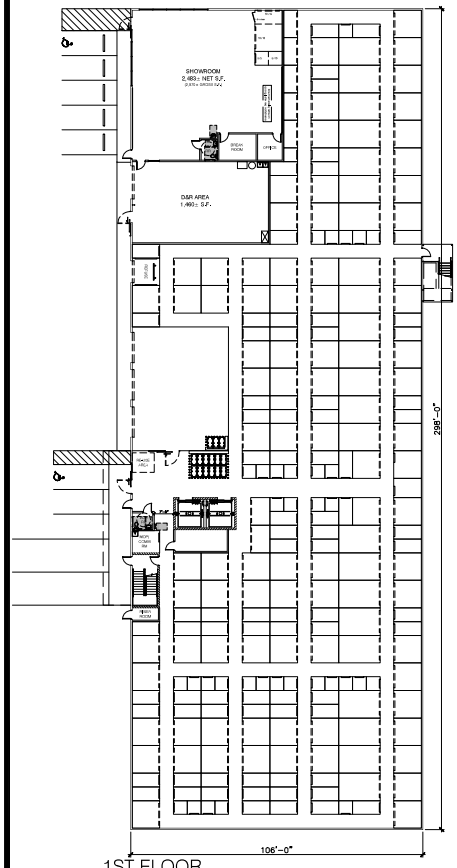
CONCEPTUAL EXTERIOR ELEVATIONS - BUILDING A
UHAUL

WEST ELEVATION
Scale: 1" = 20'

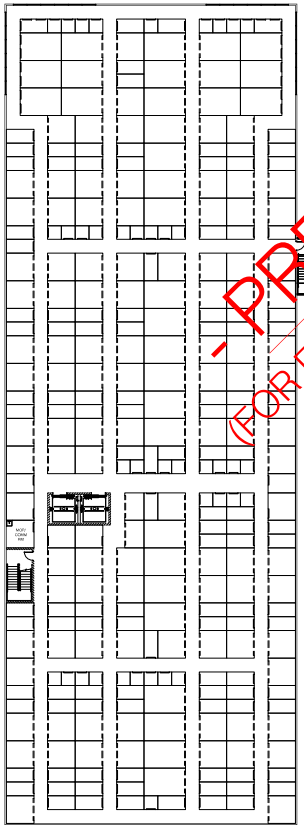
PROPOSED MIX

LOCKER SIZE	INTERIOR															EXTERIOR MINIS			GRAND TOTAL		
	1st Flr	SQ. FT.	%	2nd Flr	SQ. FT.	%	3rd Flr	SQ. FT.	%	4th Flr	SQ. FT.	%	TOTAL	SQ. FT.	%	QTY	SQ. FT.	%	QTY	SQ. FT.	%
5 x 5	35	875	5%	40	1000	5%	42	1050	5%	40	1000	5%	157	3925	5%	0	0	0%	157	3925	4%
5 x 8	0	0	0%	0	0	0%	1	40	0%	0	0	0%	1	40	0%	0	0	0%	1	40	0%
5 x 10	86	4300	25%	121	6050	27%	121	6050	27%	121	6050	27%	449	22,450	26%	0	0	0%	449	22,450	24%
7 x 8	0	0	0%	0	0	0%	1	56	0%	0	0	0%	1	56	0%	0	0	0%	1	56	0%
7 x 10	3	210	1%	4	280	1%	3	210	1%	4	280	1%	14	980	1%	0	0	0%	14	980	1%
10 x 5	0	0	0%	2	160	1%	3	240	1%	1	80	0%	6	480	1%	0	0	0%	6	480	1%
10 x 10	83	8300	48%	102	11,200	45%	100	10,000	45%	103	10,300	45%	388	38,800	46%	40	4000	40%	428	42,800	45%
10 x 15	23	3450	20%	33	4,950	22%	33	4,950	22%	33	4,950	22%	122	18,300	22%	40	6000	60%	162	24,300	26%
TOTAL	230	17,135	100%	302	22,640	100%	304	22,596	100%	302	22,660	100%	1138	85,031	100%	80	10,000	100%	1,218	95,031	100%

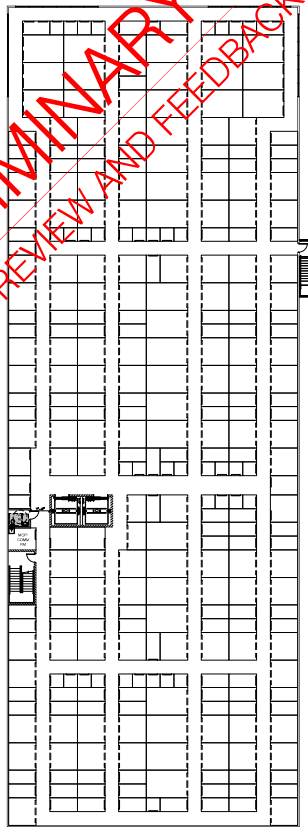
U-BOX AREA = 20,431± S.F.
TOTAL U-BOXES = 1,620 (324 x 5=HIGH)



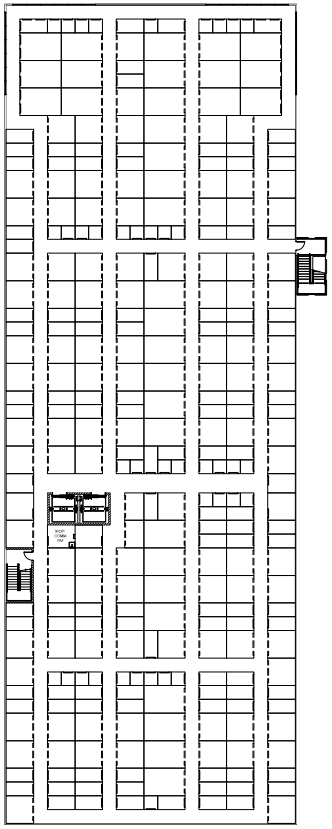
1ST FLOOR



2ND FLOOR



3RD FLOOR



4TH FLOOR

- PRELIMINARY -
(FOR FIELD REVIEW AND FEEDBACK)

FLOOR PLAN

SCALE: 1" = 20'-0"

SHEET NOTES:

REVISIONS:

NO.	DATE	INITIALS	NOTES
1	-	-	-
2	-	-	-
3	-	-	-
4	-	-	-
5	-	-	-
6	-	-	-
7	-	-	-
8	-	-	-

PROFESSIONAL SEAL:

PRELIMINARY DOCUMENTS, NOT FOR CONSTRUCTION, FOR INFORMATION ONLY

ARCHITECT LOGO:

AMERCO REAL ESTATE COMPANY
CONSTRUCTION DEPARTMENT
2727 NORTH CENTRAL AVENUE
PHOENIX, ARIZONA 85004
P: (602) 263-6502

SITE ADDRESS:
U-HAUL OF MODESTO
KIERNAN AVE & MCHENRY AVE
MODESTO, CA 95356

SHEET CONTENTS:
PROPOSED
FLOOR PLAN

710086

DRAWN: MM
CHECKED: MM
DATE: 07/12/2023
A-1

710086 A1A.DWG

EXHIBIT B-8

DEVELOPMENT STANDARDS

REZONE APPLICATION NO. PLN2023-0093
U-HAUL

Department of Planning and Community Development

1. Use(s) shall be conducted as described in the application and supporting information (including the plot plan) as approved by the Planning Commission and/or Board of Supervisors and in accordance with other laws and ordinances.

2. Pursuant to Section 711.4 of the California Fish and Game Code, the applicant is required to pay a California Department of Fish and Wildlife fee at the time of filing a "Notice of Determination." Within five (5) days of approval of this project by the Planning Commission or Board of Supervisors, the applicant shall submit to the Department of Planning and Community Development a check for **$3,025.75**, made payable to **Stanislaus County**, for the payment of California Department of Fish and Wildlife and Clerk-Recorder filing fees.

   Pursuant to Section 711.4 (e) (3) of the California Fish and Game Code, no project shall be operative, vested, or final, nor shall local government permits for the project be valid, until the filing fees required pursuant to this section are paid.

3. Developer shall pay all Public Facilities Impact Fees and Fire Facilities Fees as adopted by Resolution of the Board of Supervisors. The fees shall be payable at the time of issuance of a building permit for any construction in the development project and shall be based on the rates in effect at the time of building permit issuance.

4. The applicant/owner is required to defend, indemnify, or hold harmless the County, its officers, and employees from any claim, action, or proceedings against the County to set aside the approval of the project which is brought within the applicable statute of limitations. The County shall promptly notify the applicant of any claim, action, or proceeding to set aside the approval and shall cooperate fully in the defense.

5. The Department of Planning and Community Development shall record a Notice of Administrative Conditions and Restrictions with the County Recorder's Office within 30 days of project approval. The Notice includes: Conditions of Approval/Development Standards and Schedule; any adopted Mitigation Measures; and a project area map.

6. Prior to issuance of any building permit, a photometric lighting plan shall be submitted for review and approval by the Planning Department. All exterior lighting shall be designed (aimed down and toward the site) to provide adequate illumination without a glare effect. This shall include, but not be limited to, the use of shielded light fixtures to prevent skyglow (light spilling into the night sky) and the installation of shielded fixtures to prevent light trespass (glare and spill light that shines onto neighboring properties). Height limits of light poles and exterior lighting fixtures shall meet the City of Modesto's standards.

7. A sign plan for all proposed on-site signs indicating the location, height, area of the sign(s), and message shall be submitted to the City of Modesto for review and approval, and the City-approved plans shall be submitted to the County Planning Department for acceptance

prior to issuance of a building permit or installation. All signs shall comply with the applicable City of Modesto sign requirements for the proposed use, as described in Title 10 of the Modesto Municipal Code (MMC).

8. Should any archeological or human remains be discovered during development, work shall be immediately halted within 150 feet of the find until it can be evaluated by a qualified archaeologist. If the find is determined to be historically or culturally significant, appropriate mitigation measures to protect and preserve the resource shall be formulated and implemented. The Central California Information Center shall be notified if the find is deemed historically or culturally significant.

9. All outside storage and mechanical equipment shall be screened from the view of any public right-of-way by a screen fence of uniform construction or landscaping as approved by the Planning Director. Any required water tanks for fire suppression shall be painted to blend with the surrounding landscape or screened with landscaping and shall not be used as a sign unless approved by the Planning Director or appointed designee(s).

10. Prior to issuance of a grading permit, a parking signage and management plan shall be prepared for review and approval by the Planning and Public Works Directors, or appointed designee(s). The plan shall identify the striping, signage, rental vehicle/equipment drop-off procedures, and circulatory layout of the proposed parking lot, and identify a plan to maintain an orderly, accessible, and clearly delineated parking lot.

11. Prior to issuance of a building or grading permit, the applicant shall submit a lot merger application, and a lot merger shall be recorded to merge the project parcels.

12. Prior to issuance of any grading, encroachment, or building permit, the applicant shall submit Landscape and Irrigation Plans that meet current State of California, Modesto Municipal Code, and City of Modesto Landscape and Irrigation Specifications to the City Department of Parks, Recreation and Neighborhoods Director, or designee, for review and approval, with City-approved plans submitted to the County Planning Department for acceptance. Landscape and Irrigation design shall meet State of California AB1881 water use standards with regard for irrigation water use and runoff.

13. Landscaping pursuant to the approved landscape plan shall be maintained at all times. Dead or dying plants shall be replaced with materials of equal size and similar variety. Any dead trees shall be replaced with a similar variety of a 15-gallon size or larger.

14. No operations shall be conducted on any premises in such a manner as to cause an unreasonable amount of noise, odor, dust, smoke, vibration, or electrical interference detectable off the site.

15. The proposed parking lot shall be designed to meet City of Modesto standards.

16. Trash bins shall be kept in trash enclosures constructed of materials compatible with the architecture of the development. Trash enclosures shall be placed in locations as approved by the refuse collecting agency and the Planning Director.

Department of Public Works

17. No parking, loading, or unloading of vehicles shall be permitted within the County or State road right-of-way.

18. The developer shall install or pay for the installation of any street signs and/or markings, if warranted.

19. Access shall be approved by the responsible agency. An Encroachment Permit shall be obtained for driveway approaches at all points of ingress and egress on the project site. Driveways shall meet standards for commercial driveway approaches.

20. Prior to the issuance of a grading or building permit, a reciprocal access driveway easement shall be created for the benefit of Assessor Parcel Number (APN) 046-010-009, addressed as 418 Kiernan Avenue. The easement shall be an appurtenant easement and shall be drawn up by either a licensed land surveyor or a registered civil engineer licensed to practice land surveying in California.

21. Prior to the issuance of any building permit or grading permit, road right-of-way shall be deeded to Stanislaus County to provide a 70-foot radius cul-de-sac that meets Stanislaus County Plate 3-B1 on APN 045-010-016. The developer's qualified agent shall be aligned with the Spyres Way centerline per Stanislaus County Parcel Map 57-PM-40.

22. Prior to issuance of a grading or building permit, a Street Improvement Agreement for Spyres Way improvements shall be executed.

23. Prior to final inspection or occupancy of a building permit, street improvements shall be installed that are consistent with Caltrans standards for both McHenry Avenue (State Route 108) and Kiernan Avenue (State Route 219). The improvements shall include but are not limited to curb, gutter and sidewalk, storm drainage, driveways, matching pavement, and handicap ramps.

24. Prior to the Department of Public Works doing any plan check or inspections associated with the development, the subdivider shall sign a "Plan Check/Inspection Agreement" and post a $5,000 deposit with Public Works.

25. Prior to final inspection or occupancy of a building permit, the applicant shall complete annexation into the North McHenry 2 Lighting District or defer the requirement by entering into an agreement with the Department of Public Works. The applicant shall provide all necessary documents and pay all costs associated with the annexation process, which takes approximately six to eight months and requires Local Agency Formation Commission (LAFCO) approval.

26. Prior to final inspection or occupancy of a building permit, the developer shall either annex all project parcels into County Service Area 20 (CSA 20) to provide funds to ensure future maintenance of the Spyres Way storm drainage system or defer the requirement by entering into an agreement with the Department of Public Works. The developer shall

provide all necessary documents and pay all fees associated with formation of the CSA, which takes approximately six to eight months and requires LAFCO approval.

27. Prior to issuance of any grading or building permit which proposes to modify or abandon existing easements, all appropriate parties shall review and approve prior to recording of any new storm drainage or utility easement.

28. Prior to commencement of any grading, clearing, excavating, filling, or other disturbance of natural terrain, a Grading Permit application shall be submitted to the Building Permits Division, and be subject to the following:

    a. New development and re-development project shall contain all storm drainage on-site.

    b. Storm drainage facilities shall be designed using a 100-year, 24-hour storm. The drainage facility shall be capable of dewatering the 100-year, 24-hour storm within 48 hours. Calculations for the storm drainage capacity and dewatering shall be submitted to the engineer for approval.

        i. A comprehensive soils report shall be submitted for the proposed project. The soils report shall be prepared, stamped, and signed by a licensed geotechnical engineer experienced in soil. It shall include R-values taken at the site with a map showing the locations and depths of the test samples.

        ii. Submit a completed Regulated Project Worksheet per the Stanislaus County 2015 Post-Construction Standards Plan.

        iii. Regulated Project Volume Reduction Calculations, signed and stamped by a registered civil engineer licensed to practice in California, shall be submitted for each drainage management area and must include any control measure(s) that meet volumetric sizing criteria.

        iv. An Operation and Maintenance Plan and owner-signed and notarized Statement of Responsibility is required for all proposed treatment control measures.

    c. Dischargers of stormwater associated with construction activity that result in the disturbance of one acre or more of land area shall apply for and obtain coverage under 2022 Construction General Permit.

Department of Environmental Resources (DER) – Environmental Health Division

29. Prior to the issuance of any building permit, the applicant(s) shall obtain a fully executed 'Will-Serve Letter' from the City of Modesto for municipal water services to the project.

30. Existing on-site wells and/or septic tanks shall be destroyed under permit from DER and in accordance with all laws and policies (Stanislaus County and California State Model Well Standards) and agreements in place.

31. On-site wastewater treatment system (OWTS) shall be by individual Primary and Secondary wastewater treatment units, operated under conditions and guidelines established by Measure X.

32. Prior to the issuance of any grading or building permit, the applicant(s) shall submit a site plan showing the location of all water wells, in addition to the layout and design of both existing and proposed OWTS, including areas designated for future 100% expansion or replacement.

33. Any proposed work to an existing or proposed OWTS shall meet all applicable County Local Agency Management Program (LAMP) standards and required setbacks and be designed according to type and/or maximum occupancy of the proposed structure to the estimate waste/sewage design flow rate.

Department of Environmental Resources (DER) – Hazardous Materials Division

34. Prior to issuance of a grading or building permit, a site investigation shall be conducted to the satisfaction of DER staff through a Phase I study, and, if determined necessary, a Phase II study. Any discovery of underground storage tanks, former underground storage tank locations, buried chemicals, buried refuse, or contaminated soil shall be brought to the immediate attention of DER.

Salida Fire Protection District

35. Prior to issuance of a building permit, all applicable Fire Service Impact Mitigation Fees as adopted by the District Board of Directors and currently in place at the time of issuance of construction permits shall be paid.

36. This project shall meet the district's requirements of on-site water for fire protection prior to construction of combustible materials. Fire hydrant(s) and static source locations, connections, and access shall be approved by the District.

37. Prior to, and during, combustible construction, the District shall approve provisions for serviceable fire vehicle access and fire protection water supplies.

38. Prior to final occupancy of a building permit, a District specified Rapid Entry System (Knox Box) shall be installed and serviceable prior to final inspection allowing fire department access into gated areas, limited access points, and or buildings.

39. Prior to final occupancy of a building permit, buildings shall have fire sprinklers meeting the standards listed within the adopted California Fire Code and related amendments.

40. Prior to final occupancy of a building permit, gated 2 ½" hose connections (Class III) for fire department use shall be installed on all floors in each required exit stairwell.

41. If traffic signals are installed and/or retrofitted for the project, signal preemption devices shall be paid for or installed by the developer/owner and shall conform to the District's standards and requirements.

42. Prior to issuance of a building permit, the property owner shall be required to annex into a Community Facilities District (CFD) for operational services with the Salida Fire Protection District.

California Department of Transportation (Caltrans)

43. Prior to issuance of any building or grading permit for work which proposes to modify or relocate the existing on-site stormwater drainage basin and easement, Caltrans approval shall be obtained.

44. Prior to issuance of any building or grading permit, an encroachment permit for all driveways shall be obtained from Caltrans.

City of Modesto

45. Prior to issuance of a building permit, the applicant shall obtain a Will Serve letter from the City, subject to a recorded Outside Service Agreement.

46. At the time the sewer main is extended to the property and available for connection, an on-site easement shall be dedicated from the property for the purpose of sewer main installation, access, and maintenance.

47. The applicant shall install a 12-inch waterline in Kiernan Avenue to connect to the existing 10 inch waterline in McHenry Avenue. The ultimate connection to the City facilities will be determined based on the final site design and lot configuration for primary services and address, and subject to City approval. All applicable water connection fees shall be paid, and an encroachment permit issued from the City prior to any work being done in the public right-of-way.

48. Storm Drain design shall comply with the City's 2011 Guidance Manual for Development Stormwater Quality Control Measures and City standards to retain stormwater on-site.

Modesto Irrigation District (MID)

49. The existing abandoned-in-place irrigation facilities shall be removed within the proposed project footprint, saw-cut, slurry-filled, and plugged at each end per MID standard detail C55 or equivalent.

50. Prior to issuance of a building or grading permit, any easement for abandoned facilities shall be quitclaimed subject to applicable MID quitclaiming processes.

51. Existing MID easements for protection of overhead and underground electrical facilities shall remain.

Local Agency Formation Commission (LAFCO)

52. LAFCO review and approval of an out-of-boundary service extension shall be obtained prior to connection to the City of Modesto’s water and/or sewer systems.

San Joaquin Valley Air Pollution Control District (SJVAPCD)

53. Any construction resulting from this project shall comply with standardized dust control adopted by the SJVAPCD and may be subject to additional regulations/permits, as determined by the SJVAPCD.

54. The proposed project shall be subject to SJVAPCD Rules and Regulations in place at the time of grading or building permit issuance. Prior to issuance of a grading or building permit, the applicant shall contact the SJVAPCD's Small Business Assistance Office to determine if any SJVAPCD permits are required, including but not limited to an Authority to Construct (ATC).

Central Valley Regional Water Quality Control Board (CVRWQCB)

55. Prior to issuance of a building permit, applicant/developer shall be responsible for contacting the CVRWQCB and obtaining any necessary permits.

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Please note: If Conditions of Approval/Development Standards are amended by the Planning Commission or Board of Supervisors, such amendments will be noted in the upper right-hand corner of the Conditions of Approval/Development Standards; new wording is in bold font and deleted wording is in strikethrough text.

DEVELOPMENT SCHEDULE

REZONE APPLICATION NO. PLN2023-0093
U-HAUL

- Grading of the project site shall begin within 18 months of project approval.

- An extension of this development schedule may be granted by the Planning Director subject to the issuance of a staff approval permit to allow modification to Development Standards/Schedule.

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
1010 10TH Street, Suite 3400, Modesto, CA 95354
Planning Phone: (209) 525-6330 Fax: (209) 525-5911
Building Phone: (209) 525-6557 Fax: (209) 525-7759

CEQA INITIAL STUDY

Adapted from CEQA Guidelines APPENDIX G Environmental Checklist Form, Final Text, January 1, 2020

1.	**Project title:**	Rezone Application No. PLN2023-0093 U-Haul
2.	**Lead agency name and address:**	Stanislaus County 1010 10th Street, Suite 3400 Modesto, CA 95354
3.	**Contact person and phone number:**	Kristen Anaya, Senior Planner (209) 525-6330
4.	**Project location:**	4843 McHenry Avenue (State Route 108), between Kiernan Avenue (State Route 219) and Galaxy Way, in the Modesto area. APNs: 046-010-016 and 046-010-024
5.	**Project sponsor's name and address:**	Chris Trudell 255A Northgate Drive Manteca, CA 95336
6.	**General Plan designation:**	Planned Development Planned Industrial
7.	**Zoning:**	Planned Development (P-D) (254) General Agriculture (A-2-10)

8. Description of project:

This is a request to rezone two parcels totaling 8.57± acres from Planned Development (P-D) (254) and General Agriculture (A-2-10) to a new Planned Development in order to allow for development of a mini-storage and moving vehicle rental facility. P-D (254) was approved by the Board of Supervisors on April 10, 2001 to allow development of a mini-storage facility. The parcel never developed and the zoning expired; consequently, a new rezone application is required to now develop both project parcels with the proposed mini-storage facility. The project site is currently vacant, with the exception of a portion of Assessor's Parcel Number (APN) 046-010-016 which contains an existing dwelling, a detached two-car garage, and a 1.75± acre paved area utilized for vehicle display and sales associated with Robert's Auto Sales on the adjacent parcel APN 046-010-018, which has not been permitted by the County and will be abandoned as part of the proposed project.

The project proposes the construction of six structures overall:

1. One (1) 18,634± square-foot single-story building with a truck loading dock for storage of approximately 1,620 portable moving container rentals;

2. One (1) 126,352± square-foot four-story building (31,588± square-foot footprint), with 1,138 indoor self-storage units, a 2,483± square-foot ground-floor show room, and 1,460± square-foot retail sales area, and three vehicle unloading bays;

3. Three (3) 2,500± square-foot structures with 20 exterior-accessible mini storage units each; and

4. Six (6) 2,400± square-foot structures with 16 exterior-accessible mini storage units each.

The storage units within the four-story structure are indoor accessible only and will require customers to access the building via a card-swipe. No hazardous storage of flammables, chemicals or paints is proposed nor permitted per U-

Haul policy. Additionally, the project proposes to pave the entire site and develop ten customer vehicle parking stalls and 15 parking stalls for display of a variety of rental vehicles. The applicant proposes to install a total of 33,425± square feet of landscaping located along the road frontages and alongside the proposed buildings. The balance of the asphalt area will be used for the storage of a mix of pick-up trucks, cargo vans, moving trucks ranging from 10-feet to 26-feet as well as trailers and towing equipment. A development standard requiring a parking management plan to be approved prior to operation has been applied. Construction is proposed to begin by April 2026 in one phase.

The facility proposes to be open seven days per week year-round with hours of operation consisting of 7:00 a.m. to 7:00 p.m. Monday through Thursday and Saturdays, 7:00 a.m. to 8:00 p.m. on Fridays, and 9:00 a.m. to 5:00 p.m. on Sundays. A maximum of 15 employees on a peak shift and ten employees on a minimum shift are proposed, with ten customers at peak times anticipated. Up to four truck deliveries/loadings are proposed per-day. The overall daily vehicle trips are proposed to be 31 daily trips, and 53 daily weekend trips. Wall-mounted signage is proposed on the buildings. Light poles are proposed to be installed within the parking lot, and will be restricted to City of Modesto's standards including a maximum height of 15-foot.

The facility has an existing 35-foot-wide driveway onto Kiernan Avenue (State Route [SR] 219) but proposes to replace this access with a new driveway, 62-feet-wide, with exclusively right-in/right-out movements, along the SR-219 frontage. Additionally, the facility proposes to take access off McHenry Avenue (SR 108) via a single 40-foot-wide driveway. There are several existing easements on the property, including a 30-foot by 22-foot public utility easement and 25-foot-wide reciprocal access and well easement that are proposed to be relocated or vacated. There is an additional easement on APN 046-010-024 for the purposes of providing well, public utility access, and reciprocal access from the existing driveway on SR-219 to the adjoining parcels to the east, currently developed with a flooring sales business, gas station and a fast-food restaurant. This easement is proposed to be maintained to provide access between the adjoining developments but will need to be modified to address the relocated driveway. A 10-foot-wide Modesto Irrigation District (MID) irrigation easement runs along the northern and western property lines of the project site leading to a storm drainage basin at the southwest corner of APN 046-010-024. The applicant proposes to relocate the on-site basin further south onto APN 046-010-016 to handle stormwater runoff. The project will be required to connect to the City of Modesto for water service, and proposes to be served by an on-site wastewater treatment system but will be required to connect to City of Modesto's sewer lines at such a time that they become available for use. Additionally, the 126,352± square-foot structure is proposed to be located over the existing interior property lines between the project parcels. A lot line adjustment or merger will be required as a development standard to remove this conflict.

,

9. Surrounding land uses and setting: Light industrial warehouses and retail commercial uses, an apartment complex, a cardroom, vacant commercial parcels, and Kiernan Avenue (State Route 219) to the north; light industrial warehouses to the west; vacant commercial parcels and auto dealerships to the south; and a steel fabricator, orchard, and auto dealerships to the east.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.): Caltrans
Stanislaus County Department of Public Works
Stanislaus County Department of Environmental Resources

11. Attachments:

I. Emissions Modeling and Health Risk Assessment (HRA) Prioritization prepared by Terracon, dated June 19, 2024.

II. Records search by the Central California Information Center Report, dated July 28, 2023.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ **Aesthetics**	☐ **Agriculture & Forestry Resources**	☐ **Air Quality**
☐ **Biological Resources**	☐ **Cultural Resources**	☐ **Energy**
☐ **Geology / Soils**	☐ **Greenhouse Gas Emissions**	☐ **Hazards & Hazardous Materials**
☐ **Hydrology / Water Quality**	☐ **Land Use / Planning**	☐ **Mineral Resources**
☐ **Noise**	☐ **Population / Housing**	☐ **Public Services**
☐ **Recreation**	☐ **Transportation**	☐ **Tribal Cultural Resources**
☐ **Utilities / Service Systems**	☐ **Wildfire**	☐ **Mandatory Findings of Significance**

DETERMINATION: (To be completed by the Lead Agency)
On the basis of this initial evaluation:

☒ **I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.**

☐ **I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.**

☐ **I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required**

☐ **I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.**

☐ **I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.**

Signature on file **March 5, 2025**
Prepared by Kristen Anaya, Senior Planner Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration.

Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

a) Earlier Analysis Used. Identify and state where they are available for review.

b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). References to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

a) the significant criteria or threshold, if any, used to evaluate each question; and

b) the mitigation measure identified, if any, to reduce the impact to less than significant.

ISSUES

I. AESTHETICS – Except as provided in Public Resources Code Section 21099, could the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
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?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Discussion: This request proposes to develop an 8.57± acre project site with a mini storage and moving vehicle rental facility consisting of 11 structures with a cumulative building footprint of 72,122± square feet, 33,425± square feet of landscaping located along the road frontages and alongside the proposed buildings, a storm drainage basin, and the remainder of the site is proposed to be asphalted to allow rental vehicle storage. The proposed buildings are all one-story structures, with the exception of a 4-story building with indoor-accessible mini storage units, consisting of a contemporary mixed-material façade incorporating metal, faux wood metal paneling, CMU blocks, with trellis elements. The project proposes building-mounted signage only. The site itself is not considered to be a scenic resource or unique scenic vista. The site is surrounded by light industrial warehouses and retail commercial uses, an apartment complex, a cardroom, vacant commercial parcels, and Kiernan Avenue (State Route 219) to the north; light industrial warehouses to the west; vacant commercial parcels and auto dealerships to the south; and a steel fabricator, orchard, and auto dealerships to the east. The construction materials and architecture style are similar to other structures and Planned Developments in the area. Light poles are proposed to be installed within the parking lot, and will be restricted to City of Modesto's standards including a maximum height of 15-foot. Neither the City of Modesto nor Stanislaus County Planning Department have design standards that conflict with the proposed design or overall height as proposed. There are no federal or local plans, policies, regulations, or laws pertaining to aesthetics applicable to the proposed project, with the exception of signage and landscaping, and parking lot design, which require City review and approval due to the project site being located within the City of Modesto's Local Agency Formation Commission (LAFCO)-adopted Sphere of Influence.

The site itself is not considered to be a scenic resource or unique scenic vista. The only scenic designation in the County is along Interstate 5 which is over 18 miles to the west and not within view. The proposed project is not anticipated to degrade the existing visual character or quality of the site or its surroundings. Development standards will be added to this project to require a photometric lighting plan, and require all lighting fixtures to be shielded and aimed downward to reduce potential for creation of a new source of glare or sky-glow affecting the day or nighttime views of the area. A development standard requiring that the site will be well-maintained in a clean fashion, free from litter or debris, will be added to the project, and a requirement that a parking plan be approved by the Department of Public Works and Planning and Community Development to maintain the neat and orderly parking and storage of rental vehicles to maintain safe interior site circulation will be added to the project.

With development standards in place, there are no adverse impacts to the existing visual character of the site or its surroundings are anticipated.

Mitigation: None.

References: Application information; Stanislaus County Zoning Ordinance; Stanislaus County General Plan and Support Documentation[1].

II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. -- Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**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?			**X**	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?			**X**	
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))?				**X**
d) Result in the loss of forest land or conversion of forest land to non-forest use?				**X**
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?			**X**	

Discussion: The two-parcel project site is 8.57± total acres in size, includes a 4.02± acre parcel (Assessor Parcel Number 046-010-016) that is presently zoned General Agriculture (A-2-10), and a 4.55± acre parcel (APN 046-010-024) that is zoned as an expired Planned Development (P-D) (254) which was permitted to allow a mini-storage facility. The project site is currently vacant, with the exception of a portion of Assessor's Parcel Number (APN) 046-010-016 which contains an existing dwelling, a detached two-car garage, and a 1.75± acre paved area which has been improved to illegally expand the existing vehicle sales business on the adjoining parcel, APN 046-010-018.

The project site is designated as Vacant or Disturbed Land and Urban and Built-Up Land by the California State Department of Conservation Farmland Mapping and Monitoring Program. The Natural Resources Conservation Service Soil Survey identifies the site as being comprised entirely of Tujunga loamy sand, 0 to 3 percent slopes (TuA), with a California Revised Storie Index rating of Grade 2, which is considered to be prime soil; however, Objective 2.2 of Goal Two of the Agricultural Element specifies that non-agricultural urban development should be directed away from the "most productive agricultural areas" unless it can be shown that the character of the use is such that the land may reasonably be returned to agricultural use in the future. The Agricultural Element provides that in determining "most productive agricultural area," factors to be considered include but are not limited to soil types and potential for agricultural production; and availability of irrigation water; ownership and parcelization patterns; uniqueness and flexibility of use; the existence of Williamson Act contracts; existing uses and their contributions to the agricultural sector of the economy. "Most productive agricultural area" does not include any land within Local Agency Formation Commission's (LAFCO)-approved spheres of influence (SOI) of cities or community services districts and sanitary districts serving unincorporated communities. In this case, although the soils are prime, the

project site is not located in the County's most productive agricultural areas due to the makeup of the surrounding area and being in the City of Modesto's LAFCO-adopted SOI. The County's adopted Uniform Rules for Agricultural Preserves maintained under Williamson Act Contracts identifies 10 acres of prime agricultural land as the minimum size presumed large enough to sustain a viable agricultural operation. The project site is not enrolled in a Williamson Act Contract; and the 4.02± acre portion of the project site which is presently zoned General Agriculture would not be eligible for entry into a Williamson Act Contract. Per the applicant's information and aerial imagery, the subject project site has not been farmed for at least 20 years, nor does the parcel currently receive irrigation water from Modesto Irrigation District (MID). The project was referred to MID who requested that an existing abandoned-in-place irrigation pipeline be removed from the project site during project development. Further, the site's location and present surroundings, which consist of urbanized development in all directions, would not be suitable for farming practices. The project site is located within the City of Modesto's Local Agency Formation Commission's (LAFCO) adopted Sphere of Influence and designated for commercial development in accordance with the project site's Planned Development and Planned Industrial General Plan designations. Although the project site's soils are considered prime, the lack of irrigation ability, makeup and commercial, urbanized character of the surrounding area, and size of the project site are not suitable for agricultural use. Further, amending the zoning designation of the two project parcels to allow for development consistent with the existing General Plan designations would not constitute conversion of agricultural land.

The nearest parcel in agricultural production is a 48± acre parcel located over 800± feet and three parcels to the east across McHenry Avenue (State Route 108), and the nearest contracted parcel in production agriculture is located approximately 0.75± miles to the northeast across both SR-108 and SR-219; however, being that there is existing urban development on the intervening parcels, there is no likelihood the proposed project will impact agricultural practices on adjacent agricultural parcels in the area. The project will have no impact to forest land or timberland. The project is an agricultural use and does not appear to conflict with any agricultural activities in the area and/or lands enrolled in the Williamson Act. Based on the specific features and design of this project, it does not appear this project will impact the long-term productive agricultural capability of surrounding contracted lands in the A-2 zoning district. There is no indication this project will result in the removal of adjacent contracted land from agricultural use.

Mitigation: None.

References: Application information; Natural Resources Conservation Service Soil Survey; Stanislaus Soil Survey (1957); Referral response from the Modesto Irrigation District, dated October 30, 2023; California State Department of Conservation Farmland Mapping and Monitoring Program - Stanislaus County Farmland 2018; Stanislaus County General Plan and Support Documentation[1].

III. 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:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?			**X**	
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?			**X**	
c) Expose sensitive receptors to substantial pollutant concentrations?			**X**	
d) Result in other emissions (such as those odors adversely affecting a substantial number of people?			**X**	

Discussion: The proposed project is located within the San Joaquin Valley Air Basin (SJVAB) and, therefore, falls under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). In conjunction with the Stanislaus Council of Governments (StanCOG), the SJVAPCD is responsible for formulating and implementing air pollution control strategies. The SJVAPCD's most recent air quality plans are the 2007 PM10 (respirable particulate matter) Maintenance Plan, the 2008 PM2.5 (fine particulate matter) Plan, and the 2007 Ozone Plan. These plans establish a comprehensive air pollution control program leading to the attainment of state and federal air quality standards in the SJVAB, which has been classified as "extreme non-attainment" for ozone, "attainment" for respirable particulate matter (PM-10), and "non-attainment" for PM 2.5, as defined by the Federal Clean Air Act.

This request proposes to develop an 8.57± acre project site with a mini storage and moving vehicle rental facility consisting of 11 structures with a cumulative building footprint of 72,122± square feet, 33,425± square feet of landscaping located along the road frontages and alongside the proposed buildings, a storm drainage basin, and the remainder of the site is proposed to be asphalted to allow rental vehicle storage.

Grading and construction activities associated with the new development can temporarily increase localized PM10, PM2.5, volatile organic compound (VOC), nitrogen oxides (NOX), sulfur oxides (SOX), and carbon monoxide (CO) concentrations within a project's vicinity. The primary source of construction-related CO, SOX, VOC, and NOX emission is gasoline and diesel-powered, heavy-duty mobile construction equipment. Primary sources of PM10 and PM2.5 emissions are generally clearing and demolition activities, grading operations, construction vehicle traffic on unpaved ground, and wind blowing over exposed surfaces. Any construction will be required to occur in compliance with all SJVAPCD regulations.

The primary source of air pollutants generated by this project would be classified as being generated from "mobile" sources. Mobile sources would generally include dust from roads, farming, and automobile exhausts. Mobile sources are generally regulated by the Air Resources Board of the California EPA which sets emissions for vehicles and acts on issues regarding cleaner burning fuels and alternative fuel technologies. As such, the SJVAPCD has addressed most criteria air pollutants through basin wide programs and policies to prevent cumulative deterioration of air quality within the SJVAB.

The facility proposes to be open seven days per week year-round with hours of operation consisting of 7:00 a.m. to 7:00 p.m. Monday through Thursday and Saturdays, 7:00 a.m. to 8:00 p.m. on Fridays, and 9:00 a.m. to 5:00 p.m. on Sundays. A maximum of 15 employees on a peak shift and ten employees on a minimum shift are proposed, with ten customers at peak times anticipated. Up to four truck deliveries/loadings are proposed per-day. The overall daily vehicle trips are proposed to be 31 daily trips, and 53 daily weekend trips.

A comment was received from SJVAPCD in response to the Early Consultation prepared for the proposed project indicating that construction and operation-related emissions for the project are not expected to exceed any of the significance thresholds as identified in the SJVAPCD's Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI), including: 100 tons per-year of carbon monoxide (CO), ten tons per-year of oxides of nitrogen (NOx), ten tons per-year of reactive organic gases (ROG), 27 tons per-year of oxides of sulfur (SOx), 15 tons per-year of particulate matter of ten microns or less in size (PM10), or 15 tons per-year of particulate matter of 2.5 microns or less in size (PM2.5); however, the District indicated that emissions generated by the proposed project should be studied further via a California Emission Estimator Model (CalEEMod) analysis, and that in order to determine potential health impacts on surrounding receptors (such as residences, hospitals, day-care facilities, etc.) a Prioritization (screening-level assessment) and/or Health Risk Assessment (HRA) should be performed for the project. To evaluate the project's health related impacts. Additionally, the District requested that an Ambient Air Quality Analysis (AAQA) be included if emissions of any pollutant exceeds 100 pounds per-day. The project may be subject to the following District Rules: Rules 2010 and 2201 (Air Quality Permitting for Stationary Sources), Rule 4002 (National Emissions Standards for Hazardous Air Pollutants), Regulation VIII (Fugitive PM10 Prohibitions), Rule 4102 Nuisance, Rules 4601 Architectural Coatings, 4641 Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations, Rule 4550 (Conservation Management Practices), and Rule 4570 (Confined Animal Facilities). Additionally, the Air District has stated the project is subject to District Rule 9510. A development standard will be placed on the project requiring that the applicant be in compliance with the District's rules and regulations prior to issuance of a building, grading, or demolition permit.

A memorandum, *Emissions Modeling and Health Risk Assessment (HRA) Prioritization* dated June 19, 2024, was completed by Terracon, to quantify the amount of air pollutants per-day resulting from mobile and stationary sources associated with both construction and operations, and to study health related impacts of the proposed project. Impacts associated with the construction and operation of the proposed project was done using the California Emissions Estimator Model (CalEEMod) and California Air Pollution Control Officer's Association (CAPCOA) methodology. The CalEEMod evaluated the project with both exclusive outdoor storage and with construction of the proposed 150,000 square-foot warehouse, assuming the default trip rates as outlined by the applicable California Statewide travel Demand Model (CASDM) and Metropolitan Planning Organization/Regional Transportation Planning Agency (MPO/RTPA) default trip distances for the San Joaquin Valley Air Basin, and Institute of Traffic Engineers (ITE) default trip rates, that no soil will be imported or exported from the project site. The analysis found that expected criteria pollutant emissions resulting from the project will be less than the thresholds of 100 pounds per-day for ROG, CO, SO2, NOx, PM10, and PM2.5. A Prioritization evaluation was conducted for the facility to calculate a prioritization score for each toxic air contaminant (TAC) and examine the health risk and emission impacts from project operations, including non-carcinogenic acute health risk, non-carcinogenic chronic health risk, and carcinogenic/cancer score. The primary TAC of concern is diesel particulate matter, which is a byproduct of diesel engine combustion. The Prioritization score for the project resulted in a cancer risk, chronic non-cancer

risk, and acute non-cancer risk of less than 1, which falls under the threshold for health risk to sensitive receptors. The Air District reviewed this analysis and concurred with the findings.

As required by CEQA Guidelines Section 15064.3, potential impacts regarding Air Quality should be evaluated using Vehicle Miles Traveled (VMT). Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. One of the guidelines, presented in the December 2018 document Technical Advisory on Evaluating Transportation Impacts in CEQA, identifies projects and areas presumed to have a less than significant, which includes, absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per-day as generally assumed to cause a less-than significant transportation impact. As mentioned, the project is anticipated to generate up to four truck deliveries/loadings are proposed per-day. The overall daily vehicle trips are proposed to be four truck trips, 31 daily passenger vehicle trips, and 53 daily weekend passenger vehicle trips, which falls under the screening threshold for VMT.

The proposed project is considered to be consistent with all applicable air quality plans. The proposed project would not conflict with applicable regional plans or policies adopted by agencies with jurisdiction over the project and would be considered to have a less-than significant impact to air quality.

Mitigation: None.

References: Application information; Emissions Modeling and Health Risk Assessment (HRA) Prioritization prepared by Terracon, dated June 19, 2024; San Joaquin Valley Air Pollution Control District - Regulation VIII Fugitive Dust/PM-10 Synopsis; www.valleyair.org; Governor's Office of Planning and Research Technical Advisory, December 2018; Joaquin Valley Air Pollution Control District's Small Project Analysis Level (SPAL) Guidance, November 13, 2020; Referral response from the San Joaquin Valley Air Pollution Control District, dated October 26, 2023; Stanislaus County General Plan and Support Documentation[1].

IV. BIOLOGICAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			**X**	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			**X**	
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?			**X**	
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?			**X**	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			**X**	

f)	**Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**			**X**	

Discussion: It does not appear this project will result in impacts to endangered species or habitats, locally designated species, or wildlife dispersal or mitigation corridors. There is no known or documented sensitive or protected species or natural community located on the site. The project is located within the Riverbank Quad of the United States Geological Survey 7.5-minute quadrangle maps. According to the California Natural Diversity Database (CNDDB) Quad Species List, there are nine animal or botanical species which are state or federally listed as endangered or threatened, or proposed threatened species, that have been recorded to either occur or have occurred within the Quad. These species include: Swainson's hawk, vernal pool fairy shrimp, vernal pool tadpole shrimp, green sturgeon, steelhead, chinook salmon (spring and fall-run), Crotchs bumble bee, valley elderberry longhorn beetle.

This request proposes to develop an 8.57± acre project site with a mini storage and moving vehicle rental facility consisting of 11 structures with a cumulative building footprint of 72,122± square feet, 33,425± square feet of landscaping located along the road frontages and alongside the proposed buildings, a storm drainage basin, and the remainder of the site is proposed to be asphalted to allow rental vehicle storage. The project site is presently vacant with the exception of an existing stormwater drainage basin, an existing dwelling, a detached two-car garage, and a 1.75± acre paved area used for the unpermitted expansion of a vehicle sales area associated with Robert's Auto Sales on the adjacent parcel on APN 046-010-018. The project site represents infill development, and is surrounded by light industrial warehouses and retail commercial uses, an apartment complex, a cardroom, vacant commercial parcels, and Kiernan Avenue (State Route 219) to the north; light industrial warehouses to the west; vacant commercial parcels and auto dealerships to the south; and a steel fabricator, orchard, and auto dealerships to the east.

Neither the site nor surrounding area contains nor is adjacent to aquatic resources such as vernal pools, rivers, tributaries, creeks, lakes, or wetlands which makes the presence of any of the identified special status fish or crustacean species unlikely to occur on-site. Due to the site's surrounding area being disturbed with construction, demolition, and commercial activities, the occurrences of the listed animal, insect, or bird species are unlikely to occur, nor is the site characteristic of any substantial foraging habitat.

The project will not conflict with a Habitat Conservation Plan, a Natural Community Conservation Plan, or other locally approved conservation plans. Impacts to endangered species or habitats, locally designated species, or wildlife dispersal or mitigation corridors is considered to be less than significant.

An Early Consultation was referred to the California Department of Fish and Wildlife (formerly the Department of Fish and Game) and no response was received.

Impacts to biological resources are considered to be less than significant.

Mitigation: None.

References: Application information; California Department of Fish and Wildlife's Natural Diversity Database Quad Species List; Stanislaus County General Plan and Support Documentation[1].

V. CULTURAL RESOURCES -- Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?			**X**	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			**X**	
c) Disturb any human remains, including those interred outside of formal cemeteries?			**X**	

Discussion: As this project does not include a request for a General Plan Amendment, it was not subject to tribal consultation in accordance with SB 18 or AB 52 requirements, as Stanislaus County has not received any requests for consultation from the tribes listed with the NAHC. A records search conducted by the Central California Information Center (CCIC) indicated that there are no historical, cultural, or archeological resources recorded on-site and that the site has a low sensitivity for the discovery of such resources. A development standard will be added to the project which requires if any cultural or tribal resources are discovered during project-related activities, all work is to stop, and the lead agency and a qualified professional are to be consulted to determine the importance and appropriate treatment of the find. Cultural Impacts are considered to be less-than significant.

Light industrial warehouses and retail commercial uses, an apartment complex, a cardroom, vacant commercial parcels, and Kiernan Avenue (State Route 219) to the north; light industrial warehouses to the west; vacant commercial parcels and auto dealerships to the south; and a steel fabricator, orchard, and auto dealerships to the east.

Mitigation: None.

References: Records search by the Central California Information Center Report, dated July 28, 2023; Stanislaus County General Plan and Support Documentation[1].

VI. ENERGY -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**			X	
b) **Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**			X	

Discussion: The CEQA Guidelines Appendix F states that energy consuming equipment and processes, which will be used during construction or operation such as: energy requirements of the project by fuel type and end use, energy conservation equipment and design features, energy supplies that would serve the project, total estimated daily vehicle trips to be generated by the project, and the additional energy consumed per trip by mode shall be taken into consideration when evaluating energy impacts. Additionally, the project's compliance with applicable state or local energy legislation, policies, and standards must be considered.

The project proposes demolition, grading, and construction activities in order to develop an 8.57± acre project site with a mini storage and moving vehicle rental facility consisting of 11 structures with a cumulative building footprint of 72,122± square feet, 33,425± square feet of landscaping located along the road frontages and alongside the proposed buildings, a storm drainage basin, and the remainder of the site is proposed to be asphalted to allow rental vehicle storage.

The facility proposes to be open seven days per week year-round with hours of operation consisting of 7:00 a.m. to 7:00 p.m. Monday through Thursday and Saturdays, 7:00 a.m. to 8:00 p.m. on Fridays, and 9:00 a.m. to 5:00 p.m. on Sundays. A maximum of 15 employees on a peak shift and 10 employees on a minimum shift are proposed, with ten customers at peak times anticipated. Up to four truck deliveries/loadings are proposed per-day. The overall daily vehicle trips are proposed to be 31 daily trips, and 53 daily weekend trips.

Any future construction must meet California Green Building Standards Code (CALGreen Code), which includes mandatory provisions applicable to all new residential, commercial, and school buildings. The intent of the CALGreen Code is to establish minimum statewide standards to significantly reduce the greenhouse gas emissions from new construction. The Code includes provisions to reduce water use, wastewater generation, and solid waste generation, as well as requirements for bicycle parking and designated parking for fuel-efficient and carpool/vanpool vehicles in commercial development. It is the intent of the CALGreen Code that buildings constructed pursuant to the Code achieve at least a 15 percent reduction in energy usage when compared to the State's mandatory energy efficiency standards contained in Title 24. The Code also sets limits on VOCs (volatile organic compounds) and formaldehyde content of various building materials, architectural coatings, and adhesives. A development standard will be placed on the project requiring all construction activities be in

compliance with all SJVAPCD regulations and with Title 24, Green Building Code, which includes energy efficiency requirements.

A comment was received from SJVAPCD in response to the Early Consultation prepared for the proposed project indicating that construction and operation-related emissions for the project are not expected to exceed any of the significance thresholds as identified in the SJVAPCD's Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI), including: 100 tons per-year of carbon monoxide (CO), ten tons per-year of oxides of nitrogen (NOx), ten tons per-year of reactive organic gases (ROG), 27 tons per-year of oxides of sulfur (SOx), 15 tons per-year of particulate matter of ten microns or less in size (PM10), or 15 tons per-year of particulate matter of 2.5 microns or less in size (PM2.5); however, the District indicated that the project may be subject to the following District Rules: Rules 2010 and 2201 (Air Quality Permitting for Stationary Sources), Rule 4002 (National Emissions Standards for Hazardous Air Pollutants), Regulation VIII (Fugitive PM10 Prohibitions), Rule 4102 Nuisance, Rules 4601 Architectural Coatings, 4641 Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations, Rule 4550 (Conservation Management Practices), and Rule 4570 (Confined Animal Facilities). Further, they recommended that emissions generated by the proposed project should be studied further via a California Emission Estimator Model (CalEEMod) analysis, and that in order to determine potential health impacts on surrounding receptors (such as residences, hospitals, day-care facilities, etc.) a Prioritization (screening-level assessment) and/or Health Risk Assessment (HRA) should be performed for the project. Potential toxic air contaminants resulting from the project would be caused by mobile emissions created by truck trips and idling. As mentioned in Section III – *Air Quality* of this Initial Study, a memorandum, *Emissions Modeling and Health Risk Assessment (HRA) Prioritization* dated June 19, 2024, was completed by Terracon, to quantify the amount of air pollutants per-day resulting from mobile and stationary sources associated with both construction and operations, and to study health related impacts resulting from toxic air contaminants generated by the proposed project. The memo found that the project would not exceed significance thresholds for impacts on ambient air quality or health risk.

The project site is in the service boundary of Modesto Irrigation District (MID) who responded to the project indicating that an existing abandoned-in-place irrigation pipeline be removed from the project site during project development, requested easements remain in place to protect existing high voltage electrical overhead infrastructure within and adjacent to the project area, and requested that any relocation or installation of electrical facilities conform to MID's Electric Service Rules, as required by the Electrical Engineering Department. These comments will be added to the project as Development Standards.

Additionally, Senate Bill 743 (SB743) requires that the transportation impacts under the California Environmental Quality Act (CEQA) evaluate impacts by using Vehicle Miles Traveled (VMT) as a metric. Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. One of the guidelines, presented in the December 2018 document Technical Advisory on Evaluating Transportation Impacts in CEQA, identifies projects and areas presumed to have a less than significant, which includes, absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per-day as generally assumed to cause a less-than significant transportation impact. As mentioned, the project is anticipated to generate 31 daily trips, and 53 daily weekend trips, and up to four truck deliveries/loadings. Accordingly, VMT impacts are anticipated to be less than significant.

The project will be required to meet all applicable Air District standards and to obtain all applicable Air District permits. The proposed project would be consistent with all applicable renewable energy or energy efficiency requirements. Impacts related to Energy are considered to be less-than significant.

Mitigation: None.

References: Application information; Emissions Modeling and Health Risk Assessment (HRA) Prioritization prepared by Terracon, dated June 19, 2024; San Joaquin Valley Air Pollution Control District - Regulation VIII Fugitive Dust/PM-10 Synopsis; www.valleyair.org; Governor's Office of Planning and Research Technical Advisory, December 2018; Joaquin Valley Air Pollution Control District's Small Project Analysis Level (SPAL) Guidance, November 13, 2020; Referral response from the Modesto Irrigation District, dated October 30, 2023; Referral response from the San Joaquin Valley Air Pollution Control District, dated October 26, 2023; Emissions Modeling and Health Risk Assessment (HRA) Prioritization prepared by Terracon, dated June 19, 2024; and the Stanislaus County General Plan and Support Documentation[1]

VII. GEOLOGY AND SOILS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			X	
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.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			X	
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

Discussion: The USDA Natural Resources Conservation Service's Eastern Stanislaus County Soil Survey indicates that the property is comprised entirely of Tujunga loamy sand, 0 to 3 percent slopes (TuA). As contained in Chapter 5 of the General Plan Support Documentation, the areas of the County subject to significant geologic hazard are located in the Diablo Range, west of Interstate 5; however, as per the California Building Code, all of Stanislaus County is located within a geologic hazard zone (Seismic Design Category D, E, or F) and a soils test may be required at building permit application. Results from the soils test will determine if unstable or expansive soils are present. If such soils are present, special engineering of the structure will be required to compensate for the soil deficiency. Any structures resulting from this project will be designed and built according to building standards appropriate to withstand shaking for the area in which they are constructed. An early consultation referral response received from the Department of Public Works indicated that a grading, drainage, and erosion/sediment control plan for the project will be required, subject to Public Works review and Standards and Specifications. Likewise, any addition or expansion of a septic tank or alternative waste water disposal system will require the approval of the Department of Environmental Resources (DER) through the building permit process, which also takes soil type into consideration within the specific design requirements.

The project proposes demolition, grading, and construction activities in order to develop an 8.57± acre project site with a mini storage and moving vehicle rental facility consisting of 11 structures with a cumulative building footprint of 72,122± square feet, 33,425± square feet of landscaping located along the road frontages and alongside the proposed buildings, a storm drainage basin, and the remainder of the site is proposed to be asphalted to allow rental vehicle storage.

The project site is located within City of Modesto's service boundary for sewer and water and has requested a will-serve from the City of Modesto for water service, and proposes to utilize an on-site wastewater treatment system (OWTS) due to the unavailability of a sewer main connection. A will-serve letter and all necessary water or sewer connection fees to be paid prior to connection. All requirements, including Local Agency Management Plan (LAMP) standards and Measure X requirements for the proposed OWTS will be required to be met at the time a building permit is applied for. These requirements will be added to the project as development standards.

It does not appear that this project will result in significant impacts to any paleontological resources or unique geologic features. Development standards applicable to development of the parcels regarding the discovery of such resources during the construction process will be added to the project. The project site is not located near an active fault or within a high earthquake zone. Landslides are not likely due to the flat terrain of the area. Impacts related to geology and soils are considered to be less than significant.

The project site is not located near an active fault or within a high earthquake zone. Any future structures will be designed and built according to building standards appropriate to withstand shaking for the area in which they are constructed. Landslides are not likely due to the flat terrain of the area. DER, Public Works, and the Building Permits Division review and approve any building or grading permit to ensure their standards are met.

Mitigation: None.

References: Application information; Referral response from the Department of Environmental Resources (DER), dated October 27, 2023; Referral response from the City of Modesto Utilities Department, dated October 30, 2023; Referral response from the Stanislaus County Department of Public Works dated January 24, 2025; Stanislaus County General Plan and Support Documentation[1].

VIII. GREENHOUSE GAS EMISSIONS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			**X**	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			**X**	

Discussion: The principal Greenhouse Gasses (GHGs) are carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), sulfur hexafluoride (SF6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H2O). CO2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potentials of different GHGs, GHG emissions are often quantified and reported as CO2 equivalents (CO2e). In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] No. 32), which requires the California Air Resources Board (ARB) design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020. Two additional bills, SB 350 and SB32, were passed in 2015 further amending the states Renewables Portfolio Standard (RPS) for electrical generation and amending the reduction targets to 40 percent of 1990 levels by 2030.

The project proposes demolition, grading, and construction activities in order to develop an 8.57± acre project site with a mini storage and moving vehicle rental facility consisting of 11 structures with a cumulative building footprint of 72,122± square feet, 33,425± square feet of landscaping located along the road frontages and alongside the proposed buildings, a storm drainage basin, and the remainder of the site is proposed to be asphalted to allow rental vehicle storage.

The facility proposes to be open seven days per week year-round with hours of operation consisting of 7:00 a.m. to 7:00 p.m. Monday through Thursday and Saturdays, 7:00 a.m. to 8:00 p.m. on Fridays, and 9:00 a.m. to 5:00 p.m. on Sundays. A maximum of 15 employees on a peak shift and ten employees on a minimum shift are proposed, with ten customers at peak times anticipated. Up to four truck deliveries/loadings are proposed per-day. The overall daily vehicle trips are proposed to be 31 daily trips, and 53 daily weekend trips.

As required by CEQA Guidelines Section 15064.3, potential impacts regarding Green House Gas Emissions should be evaluated using Vehicle Miles Traveled (VMT). The calculation of VMT is the number of cars/trucks multiplied by the distance traveled by each car/truck. Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. One of the guidelines, presented in the December 2018 document Technical Advisory on Evaluating Transportation Impacts in CEQA, identifies projects and areas presumed to have a less than significant, which includes, absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per-day as generally assumed to cause a less-than significant transportation impact. As mentioned, the project is anticipated to generate 31 daily trips, and 53 daily weekend trips and up to four truck deliveries/loadings per-day, Accordingly, VMT impacts are anticipated to be less than significant.

A comment was received from SJVAPCD in response to the Early Consultation prepared for the proposed project indicating that construction and operation-related emissions for the project are not expected to exceed any of the significance thresholds as identified in the SJVAPCD's Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI), including: 100 tons per-year of carbon monoxide (CO), ten tons per-year of oxides of nitrogen (NOx), ten tons per-year of reactive organic gases (ROG), 27 tons per-year of oxides of sulfur (SOx), 15 tons per-year of particulate matter of ten microns or less in size (PM10), or 15 tons per-year of particulate matter of 2.5 microns or less in size (PM2.5); however, the District indicated that the project may be subject to the following District Rules: Rules 2010 and 2201 (Air Quality Permitting for Stationary Sources), Rule 4002 (National Emissions Standards for Hazardous Air Pollutants), Regulation VIII (Fugitive PM10 Prohibitions), Rule 4102 Nuisance, Rules 4601 Architectural Coatings, 4641 Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations, Rule 4550 (Conservation Management Practices), and Rule 4570 (Confined Animal Facilities). Further, they recommended that emissions generated by the proposed project should be studied further via a California Emission Estimator Model (CalEEMod) analysis, and that in order to determine potential health impacts on surrounding receptors (such as residences, hospitals, day-care facilities, etc.) a Prioritization (screening-level assessment) and/or Health Risk Assessment (HRA) should be performed for the project. Potential toxic air contaminants resulting from the project would be caused by mobile emissions created by truck trips and idling. The project will include the addition of 30-60 truck trips per-day. As mentioned in Section III – Air Quality of this Initial Study, a memorandum, *Emissions Modeling and Health Risk Assessment (HRA) Prioritization* dated June 19, 2024, was completed by Terracon, to quantify the amount of air pollutants per-day resulting from mobile and stationary sources associated with both construction and operations, and to study health related impacts resulting from toxic air contaminants generated by the proposed project. The memo found that the project would not exceed significance thresholds for impacts on ambient air quality or health risk. A development standard will be placed on the project requiring that the applicant be in compliance with the District's rules and regulations prior to issuance of a building, grading, or demolition permit.

A development standard requiring the applicant to comply with all appropriate SJVAPCD rules and regulations and California Green Building Code will be incorporated into the project. Consequently, GHG emissions associated with this project are considered to be less than significant.

Mitigation: None.

References: Application information; Referral response from the San Joaquin Valley Air Pollution Control District, dated October 26, 2023; Emissions Modeling and Health Risk Assessment (HRA) Prioritization prepared by Terracon, dated June 19, 2024; Stanislaus County General Plan and Support Documentation[1].

IX. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	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?			**X**	
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?			**X**	

c)	**Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**			**X**	
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?**			**X**	
e)	**For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**			**X**	
f)	**Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**			**X**	
g)	**Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**			**X**	

Discussion: The Stanislaus County Department of Environmental Resources (DER) is responsible for overseeing hazardous materials. A referral response from the Hazardous Materials Division of DER indicated the project is not expected to have a significant effect on the environment, and is requiring the developer conduct a Phase I or Phase II study prior to the issuance of a grading permit to determine if organic pesticides or metals exist on the project site. The Hazardous Materials Division requested that they be contacted should any underground storage tanks, buried chemicals, buried refuse, or contaminated soil be discovered during grading or construction. These comments will be reflected through the application of development standards. The proposed use is not recognized as a generator and/or consumer of hazardous materials, therefore, no significant impacts associated with hazards or hazardous materials are anticipated to occur as a result of the proposed project. However, in the event that the proposed storage facility becomes a regulated facility in the future, the operator will be required to fill out a Hazardous Materials Business Plan, including registration and reporting to the California Environmental Reporting System (CERS).

The project site is not listed on the EnviroStor database managed by the CA Department of Toxic Substances Control or within the vicinity of any airport. The site is located in a Local Responsibility Area (LRA) for fire protection and is served by Salida Fire Protection District. The project was referred to the Salida Fire Protection District who responded requesting the project pay Fire Service Impact Mitigation Fees, provision of on-site water for fire protection, serviceable fire vehicle access, a Rapid Entry System (Knox Box) for gated areas and limited access points, and 2½- inch hose connections in each stairwell of a three- or more story building. These requirements will be added as development standards to the project.

The project site is not within the vicinity of any wildlands or airports.

Mitigation: None.

References: Application information; Referral response from the Salida Fire Protection District, dated October 23, 2023; Referral response from the Department of Environmental Resources (DER) Hazardous Materials Division, dated October 27, 2023; Stanislaus County General Plan and Support Documentation[1].

X. HYDROLOGY AND WATER QUALITY -- Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**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?			**X**	

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			**X**	
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:			**X**	
i) result in substantial erosion or siltation on- or off-site;			**X**	
ii) substantially increase the rate of amount of surface runoff in a manner which would result in flooding on- or off-site.			**X**	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			**X**	
iv) impede or redirect flood flows?			**X**	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			**X**	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			**X**	

Discussion: Areas subject to flooding have been identified in accordance with the Federal Emergency Management Act (FEMA). The project site is located in FEMA Flood Zone X, which includes areas determined to be outside the 0.2 percent annual chance floodplains. The project site is proposed to be paved, with an on-site positive storm drainage basin (storage, percolation, and treatment) installed at the northeast section of the project site.

The project proposes to maintain all stormwater on-site via stormwater drainage basins. A referral response received from Stanislaus County Department of Public Works requested a grading plan be submitted, in accordance with all Standards and Specifications.

The project proposes to develop an 8.57± acre project site with a mini storage and moving vehicle rental facility consisting of 11 structures with a cumulative building footprint of 72,122± square feet, 33,425± square feet of landscaping located along the road frontages and alongside the proposed buildings, a storm drainage basin, and the remainder of the site is proposed to be asphalted to allow rental vehicle storage.

The project site is located within City of Modesto's service boundary for sewer and water and the applicant has requested a will-serve from the City of Modesto for water service. A will-serve letter and all necessary water or sewer connection fees to be paid prior to connection. These requirements will be added to the project as development standards.

At such a time that the City of Modesto sewer main becomes available for connection, a development standard will be added requiring the project to connect. In the meantime, the project proposes to utilize an on-site wastewater treatment system (OWTS). The project was referred to the Department of Environmental Resources (DER) Environmental Health Division who did not respond; however, all requirements, including Local Agency Management Plan (LAMP) standards and Measure X requirements for the proposed OWTS will be required to be met at the time a building permit is applied for. The project was also referred to DER Groundwater Divisions and that there was no comment regarding groundwater.

The Sustainable Groundwater Management Act (SGMA) was passed in 2014 with the goal of ensuring the long-term sustainable management of California's groundwater resources. SGMA requires agencies throughout California to meet certain requirements including forming Groundwater Sustainability Agencies (GSA), developing Groundwater Sustainability Plans (GSP), and achieving balanced groundwater levels within 20 years. The site is located in the Stanislaus and Tuolumne Rivers Groundwater Basin Association (STRGBA) GSA, which manages the Modesto Subbasins. A revised Groundwater Sustainability Plan has been submitted to the California Department of Water Resources (DWR) and is currently going through the review process.

The project was referred to the Central Valley Regional Water Quality Control Board (CVRWQCB) who did not respond to the project; however, a standard development standard requiring the applicant to coordinate with their agency to determine if any permits or Water Board requirements be obtained/met prior to operation will be added to the project.

The project site is in the service boundary of Modesto Irrigation District (MID) who responded to the project indicating that an existing abandoned-in-place irrigation pipeline be removed from the project site during project development, requested easements remain in place to protect existing high voltage electrical overhead infrastructure within and adjacent to the project area, and requested that any relocation or installation of electrical facilities conform to MID's Electric Service Rules, as required by the Electrical Engineering Department. These comments will be added to the project as Development Standards.

As a result of the project details, impacts associated with drainage, water quality, and runoff are expected to have a less than significant impact.

Mitigation: None.

References: Application information; Referral response from the Department of Environmental Resources (DER), dated October 27, 2023; Referral response from the City of Modesto Utilities Department, dated October 30, 2023; Referral response from the Stanislaus County Department of Public Works dated January 24, 2025; Referral response from the Modesto Irrigation District, dated October 30, 2023; Stanislaus County General Plan and Support Documentation[1].

XI. LAND USE AND PLANNING -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) **Physically divide an established community?**			X	
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?**			X	

Discussion: This is a request to rezone two parcels totaling 8.57± acres from Planned Development (P-D) (254) and General Agriculture (A-2-10) to a new Planned Development in order to allow for development of a mini-storage and moving vehicle rental facility consisting of 11 structures with a cumulative building footprint of 72,122± square feet, 33,425± square feet of landscaping located along the road frontages and alongside the proposed buildings, a storm drainage basin, and the remainder of the site is proposed to be asphalted to allow rental vehicle storage. The project parcels have General Plan designations of Planned Development and Planned Industrial, respectively. The proposed buildings are all one-story structures, with the exception of a 4-story building with indoor-accessible mini storage units, consisting of a contemporary mixed-material façade incorporating metal, faux wood metal paneling, CMU blocks, with trellis elements. The project proposes building-mounted signage only. The project site is currently vacant, with the exception of a portion of Assessor's Parcel Number (APN) 046-010-016 which contains an existing dwelling, a detached two-car garage, and a 1.75± acre paved area utilized for unpermitted expansion of a vehicle display and sales associated with Robert's Auto Sales on the adjacent parcel APN 046-010-018, which has not been permitted by the County and will be abandoned as part of the proposed project.

As discussed in Section II - *Agriculture and Forest Resources*, the project site is not located on the County's most productive agricultural areas of the County due to the makeup of the surrounding area and being within the LAFCO-adopted Sphere of Influence (SOI) of the City of Modesto. The project is surrounded by existing light industrial warehouses and retail commercial uses, an apartment complex, a cardroom, vacant commercial parcels, and Kiernan Avenue (State Route 219) to the north; light industrial warehouses to the west; vacant commercial parcels and auto dealerships to the south; and a steel fabricator, orchard, and auto dealerships to the east. The project site is contiguous to existing commercial properties and if approved, will not impede other parcels' access to County-maintained roadways and circulation systems. Additionally, the proposed land use is contiguous with existing land use patterns. Accordingly, the proposed use is not considered as physically dividing an established community.

The facility proposes to be open seven days per week year-round with hours of operation consisting of 7:00 a.m. to 7:00 p.m. Monday through Thursday and Saturdays, 7:00 a.m. to 8:00 p.m. on Fridays, and 9:00 a.m. to 5:00 p.m. on Sundays. A maximum of 15 employees on a peak shift and ten employees on a minimum shift are proposed, with ten customers at

peak times anticipated. Up to four truck deliveries/loadings are proposed per-day. The overall daily vehicle trips are proposed to be 31 daily trips, and 53 daily weekend trips.

To approve a Rezone, the Planning Commission must find that it is consistent with the General Plan. Pursuant to the General Plan, the Planned Development designation is intended for land which, because of demonstrably unique characteristics, may be suitable for a variety of uses without detrimental effects on other property. The Planned Industrial designation is intended for land where light industrial development is proposed in areas without public sewer and/or water service but shall only be used if it is practical, both physically and financially, to provide sewage disposal and water service as needed by the proposed development. This designation specifies that no buildings shall cumulatively occupy more than 70% of the area of any parcel. In this case, the proposed development is consistent with both the Planned Development and Planned Industrial designations.

The project site is located in the LAFCO-adopted SOI for the City of Modesto. In the event the project site needs water service, the project proposes to connect to the City of Modesto for public water and sewer services, subject to obtaining a formalized will-serve letter from the City of Modesto for water services and fulfillment of all applicable conditions of the will-serve. These requirements will be incorporated into the project's development standards. The project's Early Consultation was referred to the City who did not identify any issues with the project proposal. The City indicated that there is sufficient capacity for water service, and that there is not presently sewer service available to the project site. Accordingly, the project proposes to be served by an on-site wastewater treatment system (OWTS) until such a time that sewer becomes available. A development standard will be applied to the project requiring that the project connect at the time sewer is available. Additionally, the City of Modesto responded requesting all access to comply with Caltrans regulations, a lot line adjustment or merger to remove conflicts with proposed structures over the existing interior property lines between the project parcels, which will be added to the project as development standards.

The project will not physically divide an established community nor conflict with any habitat conservation plans. Project impacts related to land use and planning are considered to be less than significant.

The project site is in the service boundary of Modesto Irrigation District (MID) who responded to the project indicating that an existing abandoned-in-place irrigation pipeline be removed from the project site during project development, requested easements remain in place to protect existing high voltage electrical overhead infrastructure within and adjacent to the project area, and requested that any relocation or installation of electrical facilities conform to MID's Electric Service Rules, as required by the Electrical Engineering Department. These comments will be added to the project as Development Standards.

Mitigation: None.

References: Application information; Referral response from the Department of Environmental Resources (DER), dated October 27, 2023; Referral response from the City of Modesto Utilities Department, dated October 30, 2023; Referral response from the Stanislaus County Department of Public Works dated January 24, 2025; Referral response from the Modesto Irrigation District, dated October 30, 2023; Stanislaus County General Plan and Support Documentation[1].

XII. MINERAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	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?			**X**	
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?			**X**	

Discussion: The location of all commercially viable mineral resources in Stanislaus County has been mapped by the State Division of Mines and Geology in Special Report 173. There are no known significant resources on the site, nor is the project site located in a geological area known to produce resources.

Mitigation: None.

References: Application information; Stanislaus County General Plan and Support Documentation[1].

XIII. NOISE -- Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Included	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?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
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?			X	

Discussion: The proposed project shall comply with the noise standards included in the General Plan and Noise Control Ordinance. The project is surrounded by existing light industrial warehouses and retail commercial uses, an apartment complex, a cardroom, vacant commercial parcels, and Kiernan Avenue (State Route 219) to the north; light industrial warehouses to the west; vacant commercial parcels and auto dealerships to the south; and a steel fabricator, orchard, and auto dealerships to the east.

The nearest sensitive receptor is an apartment complex located approximately 280± feet north of the northern property line of the project site, across Kiernan Avenue (SR-219). The Stanislaus County General Plan identifies noise levels up to 70 dB Ldn (or CNEL) as the normally acceptable level of noise for commercial uses. The site itself is impacted by noise generated from Kiernan Avenue (SR-219) and McHenry Avenue (SR-108). On-site grading and construction resulting from this project may result in a temporary increase in the area's ambient noise levels; however, noise impacts associated with on-site activities and traffic are not anticipated to exceed the normally acceptable level of noise.

The site is not located within an airport land use plan.

Mitigation: None.

References: Application information; Stanislaus County General Plan and Support Documentation[1].

XIV. POPULATION AND HOUSING -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	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)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			X	

Discussion: The site is not included in the vacant sites inventory for the 2016 Stanislaus County Housing Element, which covers the 5th cycle Regional Housing Needs Allocation (RHNA) for the County or on the Draft 6th cycle Housing Element and will therefore not impact the County's ability to meet their RHNA. No population growth will be induced nor will any existing housing be displaced as a result of this project.

Mitigation: None.

References: Stanislaus County General Plan and Support Documentation[1].

XV. PUBLIC SERVICES --	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Would the project result in the 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:			**X**	
Fire protection?			**X**	
Police protection?			**X**	
Schools?			**X**	
Parks?			**X**	
Other public facilities?			**X**	

Discussion: The project site is served by Salida Fire Protection District for fire protection, Stanislaus County Sheriff's Department and the California Highway Patrol for police services, Sylvan School District and Modesto City Schools for schools, Stanislaus County for parks, and Modesto Irrigation District (MID) for electrical service. The County has adopted Public Facilities Fees, as well as Fire Facility Fees on behalf of the appropriate fire district, to address impacts to public services. All adopted public facility fees will be required to be paid at the time of building permit issuance for the proposed 11 structures with a cumulative building footprint of 72,122± square feet.

This project was circulated to all applicable school, fire, police, irrigation, and public works departments and districts during the early consultation referral period and no concerns were identified with regard to public services. The project was referred to the Salida Fire Protection District who responded requesting the project pay Fire Service Impact Mitigation Fees, provision of on-site water for fire protection, serviceable fire vehicle access, a Rapid Entry System (Knox Box) for gated areas and limited access points, and 2½- inch hose connections in each stairwell of a three- or more story building. These requirements will be added as development standards to the project.

The project site is in the service boundary of Modesto Irrigation District (MID) who responded to the project indicating that an existing abandoned-in-place irrigation pipeline be removed from the project site during project development, requested easements remain in place to protect existing high voltage electrical overhead infrastructure within and adjacent to the project area, and requested that any relocation or installation of electrical facilities conform to MID's Electric Service Rules, as required by the Electrical Engineering Department. These comments will be added to the project as Development Standards.

Mitigation: None.

References: Application information; Referral response from the Department of Environmental Resources (DER), dated October 27, 2023; Referral response from the City of Modesto Utilities Department, dated October 30, 2023; Referral response from the Salida Fire Protection District, dated October 23, 2023; Referral response from the Stanislaus County Department of Public Works dated January 24, 2025; Referral response from the Modesto Irrigation District, dated October 30, 2023; Stanislaus County General Plan and Support Documentation[1].

XVI. RECREATION --	Potentially Significant Impact	Less Than Significant With Mitigation Included	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?			**X**	
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?			**X**	

Discussion: This project will not increase demands for recreational facilities, as such impacts typically are associated with residential development. The project will be subject to payment of public facility fees at the time of building permit issuance, which will in part funds County parks.

Mitigation: None.

References: Stanislaus County General Plan and Support Documentation[1].

XVII. TRANSPORTATION -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	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?			**X**	
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			**X**	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			**X**	
d) Result in inadequate emergency access?			**X**	

Discussion: The existing project site has frontage onto both McHenry Avenue (SR-108) and Kiernan Avenue (SR-219). The project site is presently developed with an existing 35-foot-wide paved driveway onto SR-219 but proposes to replace this access with a new driveway, 62-feet-wide, with exclusively right-in/right-out movements, along the SR-219 frontage. Additionally, the facility proposes to replace an existing driveway onto SR-108 with a new 40-foot-wide paved driveway, relocated further south along the SR-108 frontage.

The facility proposes to be open seven days per week year-round with hours of operation consisting of 7:00 a.m. to 7:00 p.m. Monday through Thursday and Saturdays, 7:00 a.m. to 8:00 p.m. on Fridays, and 9:00 a.m. to 5:00 p.m. on Sundays. A maximum of 15 employees on a peak shift and ten employees on a minimum shift are proposed, with ten customers at peak times anticipated. Up to four truck deliveries/loadings are proposed per-day. The overall daily vehicle trips are proposed to be 31 daily trips, and 53 daily weekend trips.

There are several existing easements on the property, including a 30-foot by 22-foot public utility easement and 25-foot-wide reciprocal access and well easement that are proposed to be relocated or vacated. There is an additional easement on APN 046-010-024 for the purposes of providing well, public utility access, and reciprocal access from the existing driveway on SR-219 to the adjoining parcels to the east, currently developed with a flooring sales business, gas station and a fast-food restaurant. This easement is proposed to be maintained to provide access between the adjoining developments but will need to be modified to address the relocated driveway.

This project was referred to the Department of Public Works, City of Modesto, and the California Department of Transportation (Caltrans) who identified no issues with the proposed project. The City of Modesto responded requesting all access to comply with Caltrans regulations, a lot line adjustment or merger to remove conflicts with proposed structures over the existing interior property lines between the project parcels, maintenance of all stormwater on-site, a waterline to be installed, and an Outside Service Agreement to be obtained in order for a Will Serve letter to be issued. Caltrans reviewd the proposed access following revisions to the site plan circulated with the Early Consultation and approved the access locations; however, construction plans shall be submitted and an encroachment permit obtained. Public Works responded to the project with requirements related to: prohibition of parking and unloading in the road right-of-way; access to be approved through Caltrans' encroachment permit process; installation of markings and signage if warranted; a grading plan to be submitted; reciprocal access to be obtained between the project parcels; dedication of a portion of the project site to facilitate installation of a cul-de-sac for the Spyres Way extension to the south; a Street Improvement Agreement; street improvements to Caltrans standards; placement of a deposit for plan check; annexation into the North McHenry 2 Lighting District and County Service Area (CSA) 20; and installation of a deceleration or acceleration lane or appropriate queueing areas if gates are installed. These requirements will be added to the project as development standards.

Additionally, a requirement that a parking plan be approved by the Department of Public Works and Planning and Community Development to maintain the neat and orderly parking and storage of rental vehicles to maintain safe interior site circulation will be added to the project.

Additionally, Senate Bill 743 (SB743) requires that the transportation impacts under the California Environmental Quality Act (CEQA) evaluate impacts by using Vehicle Miles Traveled (VMT) as a metric. Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. One of the guidelines, presented in the December 2018 document Technical Advisory on Evaluating Transportation Impacts in CEQA, identifies projects and areas presumed to have a less than significant, which includes, absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per-day as generally assumed to cause a less-than significant transportation impact. Additionally, Senate Bill 743 (SB743) requires that the transportation impacts under the California Environmental Quality Act (CEQA) evaluate impacts by using Vehicle Miles Traveled (VMT) as a metric. Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. One of the guidelines, presented in the December 2018 document Technical Advisory on Evaluating Transportation Impacts in CEQA, identifies projects and areas presumed to have a less than significant, which includes, absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per-day as generally assumed to cause a less-than significant transportation impact. As mentioned, the project is anticipated to generate up to four truck deliveries/loadings are proposed per-day. The overall daily vehicle trips are proposed to be four truck trips, 31 daily passenger vehicle trips, and 53 daily weekend passenger vehicle trips, which falls under the screening threshold for VMT.

The proposed project is not anticipated to conflict with any transportation program, plan, ordinance, or policy.

Mitigation: None.

References: Application information; Referral response from the City of Modesto Development Department, dated October 27, 2023; Referral response from Caltrans, dated September 5, 2024 and January 22, 2025; Referral response from the Stanislaus County Department of Public Works dated January 24, 2025; Stanislaus County General Plan and Support Documentation[1].

XVIII. TRIBAL CULTURAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) 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:			X	
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			X	
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set for the in subdivision (c) of Public Resource Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

Discussion: As this project does not include a request for a General Plan Amendment, it was not subject to tribal consultation in accordance with SB 18 or AB 52 requirements, as Stanislaus County has not received any requests for consultation from the tribes listed with the Native American Heritage Commission (NAHC). A records search conducted by the Central California Information Center (CCIC) indicated that there are no historical, cultural, or archeological resources recorded on-site and that the site has a low sensitivity for the discovery of such resources. A development standard will be added to the project which requires if any cultural or tribal resources are discovered during project-related activities, all work is to stop, and the lead agency and a qualified professional are to be consulted to determine the importance and appropriate treatment of the find. It does not appear this project will result in significant impacts to any archaeological or tribal resources.

Tribal Cultural Resources are considered to be less than significant.

Mitigation: None.

References: Application information; Records search by the Central California Information Center Report, dated July 28, 2023; Stanislaus County General Plan and Support Documentation[1].

XIX. UTILITIES AND SERVICE SYSTEMS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	

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?			**X**	
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?			**X**	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			**X**	

Discussion: Limitations on providing services have not been identified. The project proposes to develop an 8.57± acre project site with a mini storage and moving vehicle rental facility consisting of 11 structures with a cumulative building footprint of 72,122± square feet, 33,425± square feet of landscaping located along the road frontages and alongside the proposed buildings, a storm drainage basin, and the remainder of the site is proposed to be asphalted to allow rental vehicle storage. The project proposes to be served by City of Modesto for water, and utilize an on-site wastewater treatment system (OWTS).

The City of Modesto responded requesting all access to comply with Caltrans regulations, a lot line adjustment or merger to remove conflicts with proposed structures over the existing interior property lines between the project parcels, maintenance of all stormwater on-site, a waterline to be installed, and an Outside Service Agreement to be obtained in order for a Will Serve letter to be issued.

The project was referred to the Department of Environmental Resources (DER) Environmental Health and Groundwater Divisions who did not identify any issues with the project. Requirements that the OWTS meet Measure X and Local Agency Program (LAMP) standards will be verified through the building permit process.

The project site is in the service boundary of Modesto Irrigation District (MID) who responded to the project indicating that an existing abandoned-in-place irrigation pipeline be removed from the project site during project development, requested easements remain in place to protect existing high voltage electrical overhead infrastructure within and adjacent to the project area, and requested that any relocation or installation of electrical facilities conform to MID's Electric Service Rules, as required by the Electrical Engineering Department. These comments will be added to the project as Development Standards.

Public Works responded to the project with requirements related to: prohibition of parking and unloading in the road right-of-way; access to be approved through Caltrans' encroachment permit process; installation of markings and signage if warranted; a grading plan to be submitted; reciprocal access to be obtained between the project parcels; dedication of a portion of the project site to facilitate installation of a cul-de-sac for the Spyres Way extension to the south; a Street Improvement Agreement; street improvements to Caltrans standards; placement of a deposit for plan check; annexation into the North McHenry 2 Lighting District and County Service Area (CSA) 20; and installation of a deceleration or acceleration lane or appropriate queueing areas if gates are installed.

The Central Valley Regional Water Quality Control Board (CVRWQCB) was referred the project and have not provided comment to date. Development standards will be added to the project requiring the applicant coordinate with their agency to determine if any permits or Water Board requirements be obtained/met prior to issuance of a building or grading permit.

No significant impacts related to Utilities and Services Systems have been identified.

Mitigation: None.

References: Application information; Referral response from the Department of Environmental Resources (DER), dated October 27, 2023; Referral response from the City of Modesto Utilities Department, dated October 30, 2023; Referral response from the Stanislaus County Department of Public Works dated January 24, 2025; Referral response from the Modesto Irrigation District, dated October 30, 2023; Stanislaus County General Plan and Support Documentation[1].

XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
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?			X	
c) Require the installation of 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?			X	
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?			X	

Discussion: The Stanislaus County Local Hazard Mitigation Plan identifies risks posed by disasters and identifies ways to minimize damage from those disasters. With the Wildfire Hazard Mitigation Activities of this plan in place, impacts to an adopted emergency response plan or emergency evacuation plan are anticipated to be less than significant. The terrain of the site is relatively flat, and the site has access to two state highways, McHenry Avenue (State Route 108) and Kiernan Avenue (State Route 219). The site is located in a Local Responsibility Area (LRA) for fire protection, the parcel is designated as urban and is served by Salida Fire Protection District. The project was referred to the Salida Fire Protection District who responded requesting the project pay Fire Service Impact Mitigation Fees, provision of on-site water for fire protection, serviceable fire vehicle access, a Rapid Entry System (Knox Box) for gated areas and limited access points, and 2½- inch hose connections in each stairwell of a three- or more story building. These requirements will be added as development standards to the project.

California Building Code establishes minimum standards for the protection of life and property by increasing the ability of a building to resist intrusion of flame and embers. Building and grading permits will be required for the improvements and will be required to meet fire code, which will be verified through the building permit review process. The project was referred to public works who are requiring a grading and drainage plan to be submitted for the project site and proposed stormwater drainage basin. At the time grading and building permits, fire protection and emergency vehicle access standards will be required to be met. These requirements will be applied as development standards for the project.

Mitigation: None.

References: Application information; Referral response from the Stanislaus County Department of Public Works dated January 24, 2025; Referral response from the Salida Fire Protection District, dated October 23, 2023; Stanislaus County General Plan and Support Documentation[1].

XXI. MANDATORY FINDINGS OF SIGNIFICANCE --	Potentially Significant Impact	Less Than Significant With Mitigation Included	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?			X	

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.)**			**X**	
c)	**Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**			**X**	

Discussion: This is a request to rezone two parcels totaling 8.57± acres from Planned Development (P-D) (254) and General Agriculture (A-2-10) to a new Planned Development in order to allow for development of a mini-storage and moving vehicle rental facility consisting of 11 structures with a cumulative building footprint of 72,122± square feet, 33,425± square feet of landscaping located along the road frontages and alongside the proposed buildings, a storm drainage basin, and the remainder of the site is proposed to be asphalted to allow rental vehicle storage. The project parcels have General Plan designations of Planned Development and Planned Industrial, respectively. As discussed in Section II - *Agriculture and Forest Resources*, the project site is not located on the County's most productive agricultural areas of the County due to the makeup of the surrounding area and being within the LAFCO-adopted Sphere of Influence (SOI) of the City of Modesto.

The facility proposes to be open seven days per week year-round with hours of operation consisting of 7:00 a.m. to 7:00 p.m. Monday through Thursday and Saturdays, 7:00 a.m. to 8:00 p.m. on Fridays, and 9:00 a.m. to 5:00 p.m. on Sundays. A maximum of 15 employees on a peak shift and ten employees on a minimum shift are proposed, with ten customers at peak times anticipated. Up to four truck deliveries/loadings are proposed per-day. The overall daily vehicle trips are proposed to be 31 daily trips, and 53 daily weekend trips.

The project site is located adjacent to existing commercial development in all directions. The project site is located in the City of Modesto's Local Agency Formation Commission's (LAFCO)-adopted Sphere of Influence (SOI). The majority of the surrounding area is developed with existing commercial development approved under various Planned Development and Planned Industrial zoning districts; however, a number of vacant commercial parcels are scattered to the north and west. Development of these parcels will require additional land use entitlements and associated environmental review. Due to the project site being located within the City's SOI, annexation into the City of Modesto's jurisdiction is a possibility. Any further development would be required to obtain land use entitlements prior to development, including consideration of whether the redesignation would be consistent with the surrounding area's development, and whether the use would constitute leapfrog or pre-mature development and would not negatively impact the surrounding area.

The project will not conflict with a Habitat Conservation Plan, a Natural Community Conservation Plan, or other locally approved conservation plans. Impacts to endangered species or habitats, locally designated species, or wildlife dispersal or mitigation corridors are considered to be less than significant. The project will not physically divide an established community. Development standards regarding the discovery of cultural resources during any future construction resulting from this request will be added to the project. Review of this project has not indicated any features which might significantly impact the environmental quality of the site and/or the surrounding area.

Mitigation: None.
References: Initial Study; Stanislaus County General Plan and Support Documentation[1].

[1]Stanislaus County General Plan and Support Documentation adopted in August 23, 2016, as amended. ***Housing Element*** adopted on April 5, 2016.

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Concord, CA 94520
P (510) 547-7771
Terracon.com

June 19, 2024

Chris Trudell
U-Haul Company of California
255A Northgate Drive
Manteca, CA 95336

Attn: Mr. Chris Trudell
T: (209) 647-3694 (office)
E: Christopher_Trudell@uhaul.com

RE: Air Dispersion Modeling and Health Risk Prioritization
Proposed U-Haul Self Storage Facility
Kiernan Ave. & McHenry Ave.
Modesto, California 95356
Terracon Proposal No.: R1247172

Dear Mr. Trudell,

Terracon Consultants, Inc. (Terracon) was retained by U-Haul of Central Valley to assist with air dispersion modeling and assessment of health risk prioritization at the proposed self-storage facility to be located near the intersection of Kiernan and McHenry Avenues in Modesto, California. The described consulting services was conducted in general accordance with Terracon's proposal PR1247172, dated June 3, 2024.

REGULATORY OVERVIEW

The California Environmental Quality Act (CEQA) is a state law that requires public agencies and local governments to evaluate and disclose the environmental impacts of proposed projects and land use decisions. The law's goal is to prevent significant environmental damage and to inform the public and government decision makers about the potential effects of proposed activities. For sites in Modesto, California, the San Joaquin Valley Air Pollution Control District (SJVAPCD) requires modeling of projected construction and operations emissions of criteria pollutants and greenhouse gasses (GHGs) for land use development projects as part of CEQA compliance. For the subject project site, the SJVAPCD has required utilization of the California Emissions Estimator Model (CalEEMod) for calculation of the estimated emissions.

Assembly Bill (AB) 2588 (Connelly), the Air Toxics "Hot Spots" Information and Assessment Act in accordance with California Health and Safety Code §44344.4(c), requires air pollution control and air quality management districts (districts) to prioritize facilities to determine which facilities must perform a health risk assessment. These facilities, for purposes of risk assessment, are ranked into high, intermediate, and low priority categories. Each district is responsible for establishing the prioritization score threshold at which facilities are required to prepare a health risk assessment. In establishing priorities, the districts are to consider the potency, toxicity, quantity, and volume of hazardous materials released from the facility, the proximity of the facility to potential receptors, and any other factors that the district determines may indicate that the facility may pose a significant risk.

PROJECT DETAILS

The proposed self-storage facility is an 8.57-acre tract of land located near the intersection of Kiernan Avenue and McHenry Avenue in Modesto, San Joaquin County, California and includes Assessor's Parcel Numbers (APNs) 046-010-016 (4.02-acres) and 046-010-024 (4.55-acres). APN 046-010-016 is currently improved with two single-story structures at the southeast corner of the parcel while APN 046-010-024 currently exists as an unimproved parcel. The existing structures will be removed as part of site development. The proposed facility is bordered by commercial properties to the immediate south, west, east of the parcel boundaries. State road 219 (Kiernan Avenue) borders the project site to the immediate north. The closest residential parcel to the site boundary is approximately 600 meters to the southwest.

The proposed self-storage facility is expected to consist of nine individual structures, asphalt covered areas, and landscaping, as detailed below:

- Building #1 – Three-story temperature-controlled structure with a footprint of approximately 39,038 square feet (SF) and total building area of approximately 117,114 SF. This structure will contain self-storage spaces, offices, and restrooms.

- Building #2 – A one-story building for storage of "PODS" with a total estimated building area of approximately 21,570 SF. This structure will not be temperature controlled or accessible to the general public.

- Buildings #3-9 – Seven single-story self-storage buildings approximately 2,500 SF each for a total estimated building area of 17,500 SF. These structures will not be temperature controlled.

- Paved Asphalt Driveways/Parking – The estimated area of paved asphalt surfaces used for driveways and parking is approximately 250,920 SF.

- Landscaping – Landscape areas for purposes of aesthetics and drainage will encompass approximately 44,280 SF.

Electricity to the proposed facility will be provided by the Modesto Irrigation District and will be used for interior and exterior lighting and cooling of Building #1. Natural gas will be provided by Pacific Gas and Electric and will primarily be used for heating of Building #1. No backup generators or stationary equipment using diesel internal combustion engines are planned at the proposed facility.

ESTIMATED EMISSIONS MODELING

Modelling of projected emissions of criteria and GHGs during construction and operations at the proposed site were performed using CalEEMod with the data output included as an attachment to this report. At the time of the modeling run, project design had not been completed for the site so specific pollutant mitigation measures were not included other than the assumption that water will be applied for dust control during the construction phase. For purposes of modelling, the following land use types were included in the model parameters using site-specific data as detailed in the preceding section:

- General Office Building (Building #1)

- Unrefrigerated Warehouse-No Rail (Buildings #2-9)
- Other Asphalt Surfaces (Driveways/Parking areas) with a subset allocated to landscape area.

Default values were used for all model calculations with exceptions for utilization of energy and water use. Energy consumption rates for electricity (kWH/SF/Year) and natural gas (kBTU/SF/Year) were estimated for each land use type using average values published by the U.S. Energy Information Administration (EIA) Commercial Buildings Energy Consumption Survey (CBECS, 2018). Water consumption rates were estimated using the median water use intensity (WUI) for self-storage facilities published by the USEPA WaterSense program.

RISK PRIORITIZATION

Guidelines for determination of health risk prioritization were developed by the California Air Pollution Control Officers Association (CAPCOA). The current revision of the Facility Prioritization Guidelines was released in August 2016 in response to modifications by the Office of Environmental Health Hazard Assessment (OEHHA) to underlying health risk assessment methodologies. Two prioritization procedures are presented in the guidelines: The Emissions and Potency Procedure and The Dispersion Adjustment Procedure. Both procedures utilize measured or calculated emissions from stationary sources in conjunction with a substances Unit Risk (cancer endpoint) or Reference Exposure Level (non-cancer endpoint), proximity to sensitive receptor, and a normalization factor.

A list of substances to be quantified for emissions from each stationary source is located in Appendix B of the Facility Prioritization Guidelines and includes individual cancer and non-cancer causing substances as well as mixtures, such as particulate matter released from diesel or gasoline internal combustion engines.

The SJVAPCD has established the following prioritization threshold scores (TS) for land use projects occurring in Modesto, California:

- Cancer Risk – Low Priority TS ≤1; High Priority TS > 10
- Non-Cancer Risk (Chronic) – Low Priority TS ≤1; High Priority TS > 10
- Non-Cancer Risk (Acute) – Low Priority TS ≤1; High Priority TS > 10

The threshold values reflect total cumulative health risk potential to sensitive receptors. A TS value of ≤1 indicates a facility is Low Priority and is exempt from submitting a Health Risk Assessment (HRA), a TS value >10 indicates a facility is High Priority and will be required to submit a HRA, and a TS value >1 but ≤10 is Intermediate Priority and may require mitigation factors.

The self-storage facility, as proposed, will not have any stationary sources that will contribute emissions of listed substances to the ambient air. Consequently, the TS scores are determined to be <1 for both the cancer and non-cancer endpoints, which categorizes the facility as Low Priority that is exempt of preparing an HRA. Should there be modifications to the existing design, as described above, then health risk prioritization should be re-evaluated.

LIMITATIONS

This work was conducted in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing under similar conditions in the same locale. The results,

findings, conclusions, and recommendations expressed in this report are based on available information and regulatory conditions in effect at the time of document preparation. The information contained in this report is only relevant to the described self-storage facility project and should not be relied upon to represent conditions at other site locations. This report has been prepared on behalf of and exclusively for use by the U-Haul Company of California for specific application to their project as described. This report is not a bidding document. Contractors or consultants reviewing this report must draw their own conclusions regarding any further investigation deemed necessary. Terracon does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report. No warranty, express or implied is made. Terracon appreciates this opportunity to provide our consulting services to the U-Haul Company of California. If there are any questions or if we can be of any further assistance, please contact me at (510) 899-7090 at your convenience.

Sincerely,

Terracon Consultant, Inc.

Prepared By:

David S. Block, Ph.D.
Project Manager | Environmental

Reviewed By:

David C. Reynolds, P.E.
National Director, Regulatory Compliance

Attachments: CalEEMod Detailed Report

Uhaul - Kiernan & McHenry, Modesto Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Uhaul - Kiernan & McHenry, Modesto
Construction Start Date	3/31/2025
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.10
Precipitation (days)	25.4
Location	37.71008518132021, -120.99754187458417
County	Stanislaus
City	Unincorporated
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2253
EDFZ	15
Electric Utility	Modesto Irrigation District
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.24

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description

General Office Building	39.0	1000sqft	0.90	117,000	0.00	0.00	—	Building 1 / Main Storage and Office
Unrefrigerated Warehouse-No Rail	39.0	1000sqft	0.90	39,000	0.00	0.00	—	Buildings 2-9 / Single Level Storage Buildings
Other Asphalt Surfaces	295	1000sqft	6.78	0.00	44.3	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-3	Use Local Construction Contractors
Construction	C-12	Sweep Paved Roads
Energy	E-7*	Require Higher Efficacy Public Street and Area Lighting
Waste	S-4*	Recycle Demolished Construction Material

* Qualitative or supporting measure. Emission reductions not included in the mitigated emissions results.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.03	3.39	31.8	31.2	0.05	1.37	9.30	10.7	1.26	4.12	5.38	—	5,501	5,501	0.22	0.12	3.34	5,525
Mit.	4.03	3.39	31.8	31.1	0.05	1.37	9.29	10.7	1.26	4.12	5.38	—	5,491	5,491	0.22	0.12	3.22	5,514
% Reduced	—	—	< 0.5%	< 0.5%	—	—	< 0.5%	< 0.5%	—	< 0.5%	< 0.5%	—	< 0.5%	< 0.5%	—	—	4%	< 0.5%

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	40.5	40.4	22.8	20.7	0.04	0.92	1.31	1.76	0.85	0.21	0.99	—	3,927	3,927	0.15	0.12	0.09	3,958
Mit.	40.5	40.4	22.8	20.7	0.04	0.92	1.28	1.75	0.85	0.21	0.99	—	3,919	3,919	0.15	0.12	0.08	3,950
% Reduced	—	—	< 0.5%	< 0.5%	—	—	2%	< 0.5%	—	3%	< 0.5%	—	< 0.5%	< 0.5%	—	—	4%	< 0.5%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.24	2.23	7.06	8.87	0.02	0.28	0.92	1.20	0.26	0.26	0.52	—	1,809	1,809	0.07	0.06	0.62	1,827
Mit.	2.24	2.23	7.06	8.82	0.02	0.28	0.91	1.19	0.26	0.26	0.52	—	1,796	1,796	0.07	0.06	0.60	1,815
% Reduced	—	—	< 0.5%	1%	—	—	1%	1%	—	1%	1%	—	1%	1%	—	—	4%	1%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.41	0.41	1.29	1.62	< 0.005	0.05	0.17	0.22	0.05	0.05	0.09	—	299	299	0.01	0.01	0.10	303
Mit.	0.41	0.41	1.29	1.61	< 0.005	0.05	0.17	0.22	0.05	0.05	0.09	—	297	297	0.01	0.01	0.10	300
% Reduced	< 0.5%	< 0.5%	< 0.5%	1%	—	—	1%	1%	—	1%	1%	—	1%	1%	—	1%	4%	1%

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2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	4.03	3.39	31.8	31.2	0.05	1.37	9.30	10.7	1.26	4.12	5.38	—	5,501	5,501	0.22	0.12	3.34	5,525
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.94	2.47	22.8	20.7	0.04	0.92	1.31	1.76	0.85	0.21	0.99	—	3,927	3,927	0.15	0.12	0.09	3,958

2026	40.5	40.4	7.23	10.5	0.01	0.32	0.47	0.49	0.29	0.06	0.33	—	1,662	1,662	0.07	0.02	0.01	1,671
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.01	0.86	7.06	8.87	0.02	0.28	0.92	1.20	0.26	0.26	0.52	—	1,809	1,809	0.07	0.06	0.62	1,827
2026	2.24	2.23	0.12	0.19	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	0.01	—	30.7	30.7	< 0.005	< 0.005	0.01	31.0
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.18	0.16	1.29	1.62	< 0.005	0.05	0.17	0.22	0.05	0.05	0.09	—	299	299	0.01	0.01	0.10	303
2026	0.41	0.41	0.02	0.03	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	5.08	5.08	< 0.005	< 0.005	< 0.005	5.13

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	4.03	3.39	31.8	31.1	0.05	1.37	9.29	10.7	1.26	4.12	5.38	—	5,491	5,491	0.22	0.12	3.22	5,514
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.94	2.47	22.8	20.7	0.04	0.92	1.28	1.75	0.85	0.21	0.99	—	3,919	3,919	0.15	0.12	0.08	3,950
2026	40.5	40.4	7.23	10.5	0.01	0.32	0.46	0.48	0.29	0.06	0.32	—	1,655	1,655	0.07	0.02	0.01	1,663
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.01	0.86	7.06	8.82	0.02	0.28	0.91	1.19	0.26	0.26	0.52	—	1,796	1,796	0.07	0.06	0.60	1,815
2026	2.24	2.23	0.12	0.19	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	0.01	—	30.3	30.3	< 0.005	< 0.005	0.01	30.6
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.18	0.16	1.29	1.61	< 0.005	0.05	0.17	0.22	0.05	0.05	0.09	—	297	297	0.01	0.01	0.10	300
2026	0.41	0.41	0.02	0.03	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	5.01	5.01	< 0.005	< 0.005	< 0.005	5.06

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.86	6.61	2.16	19.8	0.03	0.09	2.13	2.22	0.08	0.54	0.62	40.1	5,334	5,374	4.36	0.15	9.79	5,538
Mit.	6.86	6.61	2.16	19.8	0.03	0.09	2.13	2.22	0.08	0.54	0.62	40.1	5,334	5,374	4.36	0.15	9.79	5,538
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	5.45	5.29	2.31	11.6	0.03	0.07	2.13	2.20	0.07	0.54	0.62	40.1	5,107	5,147	4.38	0.16	0.53	5,305
Mit.	5.45	5.29	2.31	11.6	0.03	0.07	2.13	2.20	0.07	0.54	0.62	40.1	5,107	5,147	4.38	0.16	0.53	5,305
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	5.69	5.51	1.93	12.6	0.02	0.07	1.66	1.74	0.07	0.42	0.50	40.1	4,669	4,709	4.34	0.13	3.54	4,860
Mit.	5.69	5.51	1.93	12.6	0.02	0.07	1.66	1.74	0.07	0.42	0.50	40.1	4,669	4,709	4.34	0.13	3.54	4,860
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.04	1.01	0.35	2.29	< 0.005	0.01	0.30	0.32	0.01	0.08	0.09	6.63	773	780	0.72	0.02	0.59	805
Mit.	1.04	1.01	0.35	2.29	< 0.005	0.01	0.30	0.32	0.01	0.08	0.09	6.63	773	780	0.72	0.02	0.59	805
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.99	1.88	1.43	12.5	0.03	0.02	2.13	2.15	0.02	0.54	0.56	—	2,583	2,583	0.12	0.13	9.51	2,634
Area	4.79	4.70	0.06	6.78	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27.9	27.9	< 0.005	< 0.005	—	28.0
Energy	0.07	0.04	0.67	0.56	< 0.005	0.05	—	0.05	0.05	—	0.05	—	2,722	2,722	0.23	0.02	—	2,734
Water	—	—	—	—	—	—	—	—	—	—	—	0.76	1.39	2.16	0.08	< 0.005	—	4.67
Waste	—	—	—	—	—	—	—	—	—	—	—	39.3	0.00	39.3	3.93	0.00	—	138
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Total	6.86	6.61	2.16	19.8	0.03	0.09	2.13	2.22	0.08	0.54	0.62	40.1	5,334	5,374	4.36	0.15	9.79	5,538
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.79	1.67	1.64	11.0	0.02	0.02	2.13	2.15	0.02	0.54	0.56	—	2,384	2,384	0.14	0.14	0.25	2,429
Area	3.58	3.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.07	0.04	0.67	0.56	< 0.005	0.05	—	0.05	0.05	—	0.05	—	2,722	2,722	0.23	0.02	—	2,734
Water	—	—	—	—	—	—	—	—	—	—	—	0.76	1.39	2.16	0.08	< 0.005	—	4.67
Waste	—	—	—	—	—	—	—	—	—	—	—	39.3	0.00	39.3	3.93	0.00	—	138
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Total	5.45	5.29	2.31	11.6	0.03	0.07	2.13	2.20	0.07	0.54	0.62	40.1	5,107	5,147	4.38	0.16	0.53	5,305
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.44	1.34	1.23	8.66	0.02	0.02	1.66	1.68	0.02	0.42	0.44	—	1,932	1,932	0.10	0.11	3.26	1,970
Area	4.18	4.13	0.03	3.35	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13.8	13.8	< 0.005	< 0.005	—	13.8
Energy	0.07	0.04	0.67	0.56	< 0.005	0.05	—	0.05	0.05	—	0.05	—	2,722	2,722	0.23	0.02	—	2,734
Water	—	—	—	—	—	—	—	—	—	—	—	0.76	1.39	2.16	0.08	< 0.005	—	4.67

Waste	—	—	—	—	—	—	—	—	—	—	—	39.3	0.00	39.3	3.93	0.00	—	138
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Total	5.69	5.51	1.93	12.6	0.02	0.07	1.66	1.74	0.07	0.42	0.50	40.1	4,669	4,709	4.34	0.13	3.54	4,860
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.26	0.25	0.22	1.58	< 0.005	< 0.005	0.30	0.31	< 0.005	0.08	0.08	—	320	320	0.02	0.02	0.54	326
Area	0.76	0.75	0.01	0.61	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.28	2.28	< 0.005	< 0.005	—	2.29
Energy	0.01	0.01	0.12	0.10	< 0.005	0.01	—	0.01	0.01	—	0.01	—	451	451	0.04	< 0.005	—	453
Water	—	—	—	—	—	—	—	—	—	—	—	0.13	0.23	0.36	0.01	< 0.005	—	0.77
Waste	—	—	—	—	—	—	—	—	—	—	—	6.51	0.00	6.51	0.65	0.00	—	22.8
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Total	1.04	1.01	0.35	2.29	< 0.005	0.01	0.30	0.32	0.01	0.08	0.09	6.63	773	780	0.72	0.02	0.59	805

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.99	1.88	1.43	12.5	0.03	0.02	2.13	2.15	0.02	0.54	0.56	—	2,583	2,583	0.12	0.13	9.51	2,634
Area	4.79	4.70	0.06	6.78	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27.9	27.9	< 0.005	< 0.005	—	28.0
Energy	0.07	0.04	0.67	0.56	< 0.005	0.05	—	0.05	0.05	—	0.05	—	2,722	2,722	0.23	0.02	—	2,734
Water	—	—	—	—	—	—	—	—	—	—	—	0.76	1.39	2.16	0.08	< 0.005	—	4.67
Waste	—	—	—	—	—	—	—	—	—	—	—	39.3	0.00	39.3	3.93	0.00	—	138
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Total	6.86	6.61	2.16	19.8	0.03	0.09	2.13	2.22	0.08	0.54	0.62	40.1	5,334	5,374	4.36	0.15	9.79	5,538
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.79	1.67	1.64	11.0	0.02	0.02	2.13	2.15	0.02	0.54	0.56	—	2,384	2,384	0.14	0.14	0.25	2,429

Area	3.58	3.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.07	0.04	0.67	0.56	< 0.005	0.05	—	0.05	0.05	—	0.05	—	2,722	2,722	0.23	0.02	—	2,734
Water	—	—	—	—	—	—	—	—	—	—	—	0.76	1.39	2.16	0.08	< 0.005	—	4.67
Waste	—	—	—	—	—	—	—	—	—	—	—	39.3	0.00	39.3	3.93	0.00	—	138
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Total	5.45	5.29	2.31	11.6	0.03	0.07	2.13	2.20	0.07	0.54	0.62	40.1	5,107	5,147	4.38	0.16	0.53	5,305
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.44	1.34	1.23	8.66	0.02	0.02	1.66	1.68	0.02	0.42	0.44	—	1,932	1,932	0.10	0.11	3.26	1,970
Area	4.18	4.13	0.03	3.35	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13.8	13.8	< 0.005	< 0.005	—	13.8
Energy	0.07	0.04	0.67	0.56	< 0.005	0.05	—	0.05	0.05	—	0.05	—	2,722	2,722	0.23	0.02	—	2,734
Water	—	—	—	—	—	—	—	—	—	—	—	0.76	1.39	2.16	0.08	< 0.005	—	4.67
Waste	—	—	—	—	—	—	—	—	—	—	—	39.3	0.00	39.3	3.93	0.00	—	138
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Total	5.69	5.51	1.93	12.6	0.02	0.07	1.66	1.74	0.07	0.42	0.50	40.1	4,669	4,709	4.34	0.13	3.54	4,860
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.26	0.25	0.22	1.58	< 0.005	< 0.005	0.30	0.31	< 0.005	0.08	0.08	—	320	320	0.02	0.02	0.54	326
Area	0.76	0.75	0.01	0.61	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.28	2.28	< 0.005	< 0.005	—	2.29
Energy	0.01	0.01	0.12	0.10	< 0.005	0.01	—	0.01	0.01	—	0.01	—	451	451	0.04	< 0.005	—	453
Water	—	—	—	—	—	—	—	—	—	—	—	0.13	0.23	0.36	0.01	< 0.005	—	0.77
Waste	—	—	—	—	—	—	—	—	—	—	—	6.51	0.00	6.51	0.65	0.00	—	22.8
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Total	1.04	1.01	0.35	2.29	< 0.005	0.01	0.30	0.32	0.01	0.08	0.09	6.63	773	780	0.72	0.02	0.59	805

3. Construction Emissions Details

3.1. Demolition (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.86	2.40	22.2	19.9	0.03	0.92	—	0.92	0.84	—	0.84	—	3,425	3,425	0.14	0.03	—	3,437
Demolition	—	—	—	—	—	—	0.43	0.43	—	0.07	0.07	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.19	0.19	< 0.005	0.02	0.02	—	3.48	3.48	< 0.005	< 0.005	< 0.005	3.65
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.86	2.40	22.2	19.9	0.03	0.92	—	0.92	0.84	—	0.84	—	3,425	3,425	0.14	0.03	—	3,437
Demolition	—	—	—	—	—	—	0.43	0.43	—	0.07	0.07	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.19	0.19	< 0.005	0.02	0.02	—	3.52	3.52	< 0.005	< 0.005	< 0.005	3.69
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.07	0.61	0.55	< 0.005	0.03	—	0.03	0.02	—	0.02	—	93.8	93.8	< 0.005	< 0.005	—	94.2
Demolition	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.10	0.10	< 0.005	< 0.005	< 0.005	0.10
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.11	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.5	15.5	< 0.005	< 0.005	—	15.6
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—

Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.02	0.02	< 0.005	< 0.005	< 0.005	0.02
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.81	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	123	123	0.01	< 0.005	0.49	125
Vendor	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	45.3	45.3	< 0.005	0.01	0.12	47.4
Hauling	0.01	0.01	0.42	0.10	< 0.005	0.01	0.09	0.10	0.01	0.02	0.03	—	343	343	0.01	0.05	0.83	360
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.62	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	110	110	< 0.005	< 0.005	0.01	111
Vendor	< 0.005	< 0.005	0.07	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	45.3	45.3	< 0.005	0.01	< 0.005	47.3
Hauling	0.01	0.01	0.45	0.10	< 0.005	0.01	0.09	0.10	0.01	0.02	0.03	—	343	343	0.01	0.05	0.02	359
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.09	3.09	< 0.005	< 0.005	0.01	3.14
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.24	1.24	< 0.005	< 0.005	< 0.005	1.30
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	9.40	9.40	< 0.005	< 0.005	0.01	9.85
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.51	0.51	< 0.005	< 0.005	< 0.005	0.52
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.21	0.21	< 0.005	< 0.005	< 0.005	0.21
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.56	1.56	< 0.005	< 0.005	< 0.005	1.63

3.2. Demolition (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.86	2.40	22.2	19.9	0.03	0.92	—	0.92	0.84	—	0.84	—	3,425	3,425	0.14	0.03	—	3,437
Demolition	—	—	—	—	—	—	0.43	0.43	—	0.07	0.07	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.19	0.19	< 0.005	0.02	0.02	—	3.48	3.48	< 0.005	< 0.005	< 0.005	3.65
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.86	2.40	22.2	19.9	0.03	0.92	—	0.92	0.84	—	0.84	—	3,425	3,425	0.14	0.03	—	3,437
Demolition	—	—	—	—	—	—	0.43	0.43	—	0.07	0.07	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.19	0.19	< 0.005	0.02	0.02	—	3.52	3.52	< 0.005	< 0.005	< 0.005	3.69
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.07	0.61	0.55	< 0.005	0.03	—	0.03	0.02	—	0.02	—	93.8	93.8	< 0.005	< 0.005	—	94.2
Demolition	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.10	0.10	< 0.005	< 0.005	< 0.005	0.10
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.11	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.5	15.5	< 0.005	< 0.005	—	15.6
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.02	0.02	< 0.005	< 0.005	< 0.005	0.02
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.76	0.00	0.00	0.11	0.11	0.00	0.02	0.02	—	114	114	0.01	< 0.005	0.45	116
Vendor	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	45.3	45.3	< 0.005	0.01	0.12	47.4
Hauling	0.01	0.01	0.42	0.10	< 0.005	0.01	0.09	0.10	0.01	0.02	0.03	—	343	343	0.01	0.05	0.83	360
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.05	0.59	0.00	0.00	0.11	0.11	0.00	0.02	0.02	—	102	102	< 0.005	< 0.005	0.01	103
Vendor	< 0.005	< 0.005	0.07	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	45.3	45.3	< 0.005	0.01	< 0.005	47.3
Hauling	0.01	0.01	0.45	0.10	< 0.005	0.01	0.09	0.10	0.01	0.02	0.03	—	343	343	0.01	0.05	0.02	359
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.87	2.87	< 0.005	< 0.005	0.01	2.92
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.24	1.24	< 0.005	< 0.005	< 0.005	1.30
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	9.40	9.40	< 0.005	< 0.005	0.01	9.85
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.48	0.48	< 0.005	< 0.005	< 0.005	0.48
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.21	0.21	< 0.005	< 0.005	< 0.005	0.21
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.56	1.56	< 0.005	< 0.005	< 0.005	1.63

3.3. Site Preparation (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	3.94	3.31	31.6	30.2	0.05	1.37	—	1.37	1.26	—	1.26	—	5,295	5,295	0.21	0.04	—	5,314
Dust From Material Movemen:	—	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	1.48	1.48	< 0.005	0.15	0.15	—	17.2	17.2	< 0.005	< 0.005	0.03	18.0
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.87	0.83	< 0.005	0.04	—	0.04	0.03	—	0.03	—	145	145	0.01	< 0.005	—	146
Dust From Material Movemen:	—	—	—	—	—	—	0.21	0.21	—	0.11	0.11	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.04	0.04	< 0.005	< 0.005	< 0.005	—	0.47	0.47	< 0.005	< 0.005	< 0.005	0.49
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.16	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24.0	24.0	< 0.005	< 0.005	—	24.1
Dust From Material Movemen:	—	—	—	—	—	—	0.04	0.04	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	0.08	0.08	< 0.005	< 0.005	< 0.005	0.08
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.05	0.94	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	143	143	0.01	0.01	0.57	146

Vendor	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	45.3	45.3	< 0.005	0.01	0.12	47.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.61	3.61	< 0.005	< 0.005	0.01	3.67
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.24	1.24	< 0.005	< 0.005	< 0.005	1.30
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.60	0.60	< 0.005	< 0.005	< 0.005	0.61
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.21	0.21	< 0.005	< 0.005	< 0.005	0.21
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.4. Site Preparation (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.94	3.31	31.6	30.2	0.05	1.37	—	1.37	1.26	—	1.26	—	5,295	5,295	0.21	0.04	—	5,314
Dust From Material Movemen	—	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	1.48	1.48	< 0.005	0.15	0.15	—	17.2	17.2	< 0.005	< 0.005	0.03	18.0

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.87	0.83	< 0.005	0.04	—	0.04	0.03	—	0.03	—	145	145	0.01	< 0.005	—	146
Dust From Material Movemen:	—	—	—	—	—	—	0.21	0.21	—	0.11	0.11	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.04	0.04	< 0.005	< 0.005	< 0.005	—	0.47	0.47	< 0.005	< 0.005	< 0.005	0.49
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.16	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24.0	24.0	< 0.005	< 0.005	—	24.1
Dust From Material Movemen:	—	—	—	—	—	—	0.04	0.04	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	0.08	0.08	< 0.005	< 0.005	< 0.005	0.08
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.05	0.89	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	133	133	0.01	0.01	0.53	135
Vendor	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	45.3	45.3	< 0.005	0.01	0.12	47.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.35	3.35	< 0.005	< 0.005	0.01	3.40
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.24	1.24	< 0.005	< 0.005	< 0.005	1.30
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.55	0.55	< 0.005	< 0.005	< 0.005	0.56
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.21	0.21	< 0.005	< 0.005	< 0.005	0.21
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.07	1.74	16.3	17.9	0.03	0.72	—	0.72	0.66	—	0.66	—	2,959	2,959	0.12	0.02	—	2,970
Dust From Material Movemen:	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	8.59	8.59	< 0.005	< 0.005	0.02	9.02
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.07	0.67	0.74	< 0.005	0.03	—	0.03	0.03	—	0.03	—	122	122	< 0.005	< 0.005	—	122

Dust From Material Movemen:	—	—	—	—	—	—	0.11	0.11	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	< 0.005	—	0.35	0.35	< 0.005	< 0.005	< 0.005	0.37
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.13	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	20.1	20.1	< 0.005	< 0.005	—	20.2
Dust From Material Movemen:	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	0.06	0.06	< 0.005	< 0.005	< 0.005	0.06
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.81	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	123	123	0.01	< 0.005	0.49	125
Vendor	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	45.3	45.3	< 0.005	0.01	0.12	47.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.64	4.64	< 0.005	< 0.005	0.01	4.71
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.86	1.86	< 0.005	< 0.005	< 0.005	1.95
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.77	0.77	< 0.005	< 0.005	< 0.005	0.78
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.31	0.31	< 0.005	< 0.005	< 0.005	0.32

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Grading (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.07	1.74	16.3	17.9	0.03	0.72	—	0.72	0.66	—	0.66	—	2,959	2,959	0.12	0.02	—	2,970
Dust From Material Movemen	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	8.59	8.59	< 0.005	< 0.005	0.02	9.02
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.07	0.67	0.74	< 0.005	0.03	—	0.03	0.03	—	0.03	—	122	122	< 0.005	< 0.005	—	122
Dust From Material Movemen	—	—	—	—	—	—	0.11	0.11	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	< 0.005	—	0.35	0.35	< 0.005	< 0.005	< 0.005	0.37
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.13	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	20.1	20.1	< 0.005	< 0.005	—	20.2

Dust From Material Movemen:	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	0.06	0.06	< 0.005	< 0.005	< 0.005	0.06
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.76	0.00	0.00	0.11	0.11	0.00	0.02	0.02	—	114	114	0.01	< 0.005	0.45	116
Vendor	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	45.3	45.3	< 0.005	0.01	0.12	47.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.31	4.31	< 0.005	< 0.005	0.01	4.38
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.86	1.86	< 0.005	< 0.005	< 0.005	1.95
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.71	0.71	< 0.005	< 0.005	< 0.005	0.72
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.31	0.31	< 0.005	< 0.005	< 0.005	0.32
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	8.59	8.59	< 0.005	< 0.005	0.02	9.02
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	8.63	8.63	< 0.005	< 0.005	< 0.005	9.04
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.53	0.45	4.15	5.18	0.01	0.17	—	0.17	0.16	—	0.16	—	953	953	0.04	0.01	—	956
Onsite truck	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	0.27	0.27	< 0.005	0.03	0.03	—	3.42	3.42	< 0.005	< 0.005	< 0.005	3.59
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.08	0.76	0.95	< 0.005	0.03	—	0.03	0.03	—	0.03	—	158	158	0.01	< 0.005	—	158
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	0.57	0.57	< 0.005	< 0.005	< 0.005	0.59
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.26	0.25	0.16	2.90	0.00	0.00	0.41	0.41	0.00	0.10	0.10	—	441	441	0.02	0.02	1.76	448
Vendor	0.03	0.02	0.78	0.28	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	579	579	0.01	0.09	1.57	606
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.22	0.20	2.23	0.00	0.00	0.41	0.41	0.00	0.10	0.10	—	393	393	0.01	0.02	0.05	399
Vendor	0.03	0.02	0.83	0.29	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	579	579	0.01	0.09	0.04	605
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.07	0.92	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	161	161	< 0.005	0.01	0.30	163
Vendor	0.01	0.01	0.32	0.11	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	230	230	< 0.005	0.03	0.27	240
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.17	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	26.6	26.6	< 0.005	< 0.005	0.05	27.1
Vendor	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	38.1	38.1	< 0.005	0.01	0.04	39.8
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Building Construction (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	8.59	8.59	< 0.005	< 0.005	0.02	9.02
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	8.63	8.63	< 0.005	< 0.005	< 0.005	9.04
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.53	0.45	4.15	5.18	0.01	0.17	—	0.17	0.16	—	0.16	—	953	953	0.04	0.01	—	956
Onsite truck	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	0.27	0.27	< 0.005	0.03	0.03	—	3.42	3.42	< 0.005	< 0.005	< 0.005	3.59
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.08	0.76	0.95	< 0.005	0.03	—	0.03	0.03	—	0.03	—	158	158	0.01	< 0.005	—	158
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	0.57	0.57	< 0.005	< 0.005	< 0.005	0.59
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.26	0.24	0.15	2.72	0.00	0.00	0.38	0.38	0.00	0.09	0.09	—	409	409	0.02	0.02	1.63	416
Vendor	0.03	0.02	0.78	0.28	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	579	579	0.01	0.09	1.57	606
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.22	0.19	2.12	0.00	0.00	0.38	0.38	0.00	0.09	0.09	—	365	365	0.01	0.02	0.04	370
Vendor	0.03	0.02	0.83	0.29	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	579	579	0.01	0.09	0.04	605
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.09	0.07	0.87	0.00	0.00	0.15	0.15	0.00	0.03	0.03	—	149	149	< 0.005	0.01	0.28	152
Vendor	0.01	0.01	0.32	0.11	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	230	230	< 0.005	0.03	0.27	240

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.16	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	24.7	24.7	< 0.005	< 0.005	0.05	25.1
Vendor	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	38.1	38.1	< 0.005	0.01	0.04	39.8
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.95	0.80	7.45	9.98	0.01	0.35	—	0.35	0.32	—	0.32	—	1,511	1,511	0.06	0.01	—	1,517
Paving	0.89	0.89	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.04	0.34	0.45	< 0.005	0.02	—	0.02	0.01	—	0.01	—	68.0	68.0	< 0.005	< 0.005	—	68.3
Paving	0.04	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.3	11.3	< 0.005	< 0.005	—	11.3

Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.62	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	110	110	< 0.005	< 0.005	0.01	111
Vendor	< 0.005	< 0.005	0.07	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	45.3	45.3	< 0.005	0.01	< 0.005	47.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.08	5.08	< 0.005	< 0.005	0.01	5.16
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.04	2.04	< 0.005	< 0.005	< 0.005	2.13
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.84	0.84	< 0.005	< 0.005	< 0.005	0.85
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.34	0.34	< 0.005	< 0.005	< 0.005	0.35
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

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3.10. Paving (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.95	0.80	7.45	9.98	0.01	0.35	—	0.35	0.32	—	0.32	—	1,511	1,511	0.06	0.01	—	1,517
Paving	0.89	0.89	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.04	0.34	0.45	< 0.005	0.02	—	0.02	0.01	—	0.01	—	68.0	68.0	< 0.005	< 0.005	—	68.3
Paving	0.04	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.3	11.3	< 0.005	< 0.005	—	11.3
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.05	0.59	0.00	0.00	0.11	0.11	0.00	0.02	0.02	—	102	102	< 0.005	< 0.005	0.01	103
Vendor	< 0.005	< 0.005	0.07	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	45.3	45.3	< 0.005	0.01	< 0.005	47.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.72	4.72	< 0.005	< 0.005	0.01	4.79
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.04	2.04	< 0.005	< 0.005	< 0.005	2.13
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.78	0.78	< 0.005	< 0.005	< 0.005	0.79
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.34	0.34	< 0.005	< 0.005	< 0.005	0.35
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Paving (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.76	7.12	9.94	0.01	0.32	—	0.32	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.89	0.89	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14.8	14.8	< 0.005	< 0.005	—	14.8
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.45	2.45	< 0.005	< 0.005	—	2.46
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.05	0.57	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	107	107	< 0.005	< 0.005	0.01	109
Vendor	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	44.5	44.5	< 0.005	0.01	< 0.005	46.5
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.08	1.08	< 0.005	< 0.005	< 0.005	1.10
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.43	0.43	< 0.005	< 0.005	< 0.005	0.46
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.18	0.18	< 0.005	< 0.005	< 0.005	0.18
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.07	0.07	< 0.005	< 0.005	< 0.005	0.08
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.12. Paving (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.76	7.12	9.94	0.01	0.32	—	0.32	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.89	0.89	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14.8	14.8	< 0.005	< 0.005	—	14.8
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.45	2.45	< 0.005	< 0.005	—	2.46
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.05	0.54	0.00	0.00	0.11	0.11	0.00	0.02	0.02	—	99.7	99.7	< 0.005	< 0.005	0.01	101
Vendor	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	44.5	44.5	< 0.005	0.01	< 0.005	46.5

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.00	1.00	< 0.005	< 0.005	< 0.005	1.02
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.43	0.43	< 0.005	< 0.005	< 0.005	0.46
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.17	0.17	< 0.005	< 0.005	< 0.005	0.17
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.07	0.07	< 0.005	< 0.005	< 0.005	0.08
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	40.3	40.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.37	0.37	< 0.005	0.04	0.04	—	5.12	5.12	< 0.005	< 0.005	< 0.005	5.37
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.32	7.32	< 0.005	< 0.005	—	7.34
Architectural Coatings	2.21	2.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.29
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22
Architectural Coatings	0.40	0.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.05	0.05	< 0.005	< 0.005	< 0.005	0.05
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.03	0.41	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	77.0	77.0	< 0.005	< 0.005	0.01	78.1
Vendor	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	44.5	44.5	< 0.005	0.01	< 0.005	46.5
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.35	4.35	< 0.005	< 0.005	0.01	4.42
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.44	2.44	< 0.005	< 0.005	< 0.005	2.55
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.72	0.72	< 0.005	< 0.005	< 0.005	0.73

Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.40	0.40	< 0.005	< 0.005	< 0.005	0.42
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.14. Architectural Coating (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	40.3	40.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.37	0.37	< 0.005	0.04	0.04	—	5.12	5.12	< 0.005	< 0.005	< 0.005	5.37
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.32	7.32	< 0.005	< 0.005	—	7.34
Architectural Coatings	2.21	2.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.29
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22

Architect Coatings	0.40	0.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.05	0.05	< 0.005	< 0.005	< 0.005	0.05
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.03	0.39	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	71.5	71.5	< 0.005	< 0.005	0.01	72.6
Vendor	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	44.5	44.5	< 0.005	0.01	< 0.005	46.5
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.04	4.04	< 0.005	< 0.005	0.01	4.10
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.44	2.44	< 0.005	< 0.005	< 0.005	2.55
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.67	0.67	< 0.005	< 0.005	< 0.005	0.68
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.40	0.40	< 0.005	< 0.005	< 0.005	0.42
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	1.69	1.59	1.22	10.6	0.02	0.02	1.81	1.83	0.02	0.46	0.48	—	2,191	2,191	0.10	0.11	8.07	2,235
Unrefrigerated Warehouse-No Rail	0.30	0.28	0.22	1.89	< 0.005	< 0.005	0.32	0.33	< 0.005	0.08	0.09	—	391	391	0.02	0.02	1.44	399
Total	1.99	1.88	1.43	12.5	0.03	0.02	2.13	2.15	0.02	0.54	0.56	—	2,583	2,583	0.12	0.13	9.51	2,634
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	1.52	1.42	1.39	9.36	0.02	0.02	1.81	1.83	0.02	0.46	0.48	—	2,022	2,022	0.12	0.12	0.21	2,061
Unrefrigerated Warehouse-No Rail	0.27	0.25	0.25	1.67	< 0.005	< 0.005	0.32	0.33	< 0.005	0.08	0.09	—	361	361	0.02	0.02	0.04	368
Total	1.79	1.67	1.64	11.0	0.02	0.02	2.13	2.15	0.02	0.54	0.56	—	2,384	2,384	0.14	0.14	0.25	2,429
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	0.21	0.20	0.18	1.28	< 0.005	< 0.005	0.25	0.25	< 0.005	0.06	0.07	—	259	259	0.01	0.01	0.44	264
Unrefrigerated Warehouse-No Rail	0.05	0.05	0.04	0.30	< 0.005	< 0.005	0.06	0.06	< 0.005	0.01	0.02	—	61.1	61.1	< 0.005	< 0.005	0.10	62.3
Total	0.26	0.25	0.22	1.58	< 0.005	< 0.005	0.30	0.31	< 0.005	0.08	0.08	—	320	320	0.02	0.02	0.54	326

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	1.69	1.59	1.22	10.6	0.02	0.02	1.81	1.83	0.02	0.46	0.48	—	2,191	2,191	0.10	0.11	8.07	2,235
Unrefrigerated Warehouse-No Rail	0.30	0.28	0.22	1.89	< 0.005	< 0.005	0.32	0.33	< 0.005	0.08	0.09	—	391	391	0.02	0.02	1.44	399
Total	1.99	1.88	1.43	12.5	0.03	0.02	2.13	2.15	0.02	0.54	0.56	—	2,583	2,583	0.12	0.13	9.51	2,634
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	1.52	1.42	1.39	9.36	0.02	0.02	1.81	1.83	0.02	0.46	0.48	—	2,022	2,022	0.12	0.12	0.21	2,061
Unrefrigerated Warehouse-No Rail	0.27	0.25	0.25	1.67	< 0.005	< 0.005	0.32	0.33	< 0.005	0.08	0.09	—	361	361	0.02	0.02	0.04	368
Total	1.79	1.67	1.64	11.0	0.02	0.02	2.13	2.15	0.02	0.54	0.56	—	2,384	2,384	0.14	0.14	0.25	2,429
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	0.21	0.20	0.18	1.28	< 0.005	< 0.005	0.25	0.25	< 0.005	0.06	0.07	—	259	259	0.01	0.01	0.44	264

Unrefrigerated Warehouse-No	0.05	0.05	0.04	0.30	< 0.005	< 0.005	0.06	0.06	< 0.005	0.01	0.02	—	61.1	61.1	< 0.005	< 0.005	0.10	62.3
Total	0.26	0.25	0.22	1.58	< 0.005	< 0.005	0.30	0.31	< 0.005	0.08	0.08	—	320	320	0.02	0.02	0.54	326

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	1,709	1,709	0.14	0.02	—	1,718
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	214	214	0.02	< 0.005	—	215
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,923	1,923	0.16	0.02	—	1,933
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	1,709	1,709	0.14	0.02	—	1,718

Unrefrigerated Warehou Rail	—	—	—	—	—	—	—	—	—	—	—	—	214	214	0.02	< 0.005	—	215
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,923	1,923	0.16	0.02	—	1,933
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	283	283	0.02	< 0.005	—	284
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	35.4	35.4	< 0.005	< 0.005	—	35.6
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	318	318	0.03	< 0.005	—	320

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	1,709	1,709	0.14	0.02	—	1,718

Unrefrigerated Warehouse-No	—	—	—	—	—	—	—	—	—	—	—	—	214	214	0.02	< 0.005	—	215
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,923	1,923	0.16	0.02	—	1,933
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	1,709	1,709	0.14	0.02	—	1,718
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	214	214	0.02	< 0.005	—	215
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,923	1,923	0.16	0.02	—	1,933
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	283	283	0.02	< 0.005	—	284
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	35.4	35.4	< 0.005	< 0.005	—	35.6
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	318	318	0.03	< 0.005	—	320

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	0.07	0.04	0.67	0.56	< 0.005	0.05	—	0.05	0.05	—	0.05	—	799	799	0.07	< 0.005	—	801
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.07	0.04	0.67	0.56	< 0.005	0.05	—	0.05	0.05	—	0.05	—	799	799	0.07	< 0.005	—	801
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	0.07	0.04	0.67	0.56	< 0.005	0.05	—	0.05	0.05	—	0.05	—	799	799	0.07	< 0.005	—	801
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.07	0.04	0.67	0.56	< 0.005	0.05	—	0.05	0.05	—	0.05	—	799	799	0.07	< 0.005	—	801
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

General Office Building	0.01	0.01	0.12	0.10	< 0.005	0.01	—	0.01	0.01	—	0.01	—	132	132	0.01	< 0.005	—	133
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	0.01	0.12	0.10	< 0.005	0.01	—	0.01	0.01	—	0.01	—	132	132	0.01	< 0.005	—	133

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	0.07	0.04	0.67	0.56	< 0.005	0.05	—	0.05	0.05	—	0.05	—	799	799	0.07	< 0.005	—	801
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.07	0.04	0.67	0.56	< 0.005	0.05	—	0.05	0.05	—	0.05	—	799	799	0.07	< 0.005	—	801
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

General Office Building	0.07	0.04	0.67	0.56	< 0.005	0.05	—	0.05	0.05	—	0.05	—	799	799	0.07	< 0.005	—	801
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.07	0.04	0.67	0.56	< 0.005	0.05	—	0.05	0.05	—	0.05	—	799	799	0.07	< 0.005	—	801
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	0.01	0.01	0.12	0.10	< 0.005	0.01	—	0.01	0.01	—	0.01	—	132	132	0.01	< 0.005	—	133
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	0.01	0.12	0.10	< 0.005	0.01	—	0.01	0.01	—	0.01	—	132	132	0.01	< 0.005	—	133

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consum Products	3.36	3.36	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.22	0.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.21	1.11	0.06	6.78	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27.9	27.9	< 0.005	< 0.005	—	28.0
Total	4.79	4.70	0.06	6.78	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27.9	27.9	< 0.005	< 0.005	—	28.0
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	3.36	3.36	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.22	0.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	3.58	3.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.61	0.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.11	0.10	0.01	0.61	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.28	2.28	< 0.005	< 0.005	—	2.29
Total	0.76	0.75	0.01	0.61	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.28	2.28	< 0.005	< 0.005	—	2.29

4.3.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	3.36	3.36	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.22	0.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.21	1.11	0.06	6.78	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27.9	27.9	< 0.005	< 0.005	—	28.0
Total	4.79	4.70	0.06	6.78	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27.9	27.9	< 0.005	< 0.005	—	28.0
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	3.36	3.36	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.22	0.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	3.58	3.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.61	0.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape Equipme	0.11	0.10	0.01	0.61	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.28	2.28	< 0.005	< 0.005	—	2.29
Total	0.76	0.75	0.01	0.61	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.28	2.28	< 0.005	< 0.005	—	2.29

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.76	1.39	2.16	0.08	< 0.005	—	4.67
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	0.76	1.39	2.16	0.08	< 0.005	—	4.67
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.76	1.39	2.16	0.08	< 0.005	—	4.67

Unrefrigerated Warehouse-No	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	0.76	1.39	2.16	0.08	< 0.005	—	4.67
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.13	0.23	0.36	0.01	< 0.005	—	0.77
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	0.13	0.23	0.36	0.01	< 0.005	—	0.77

4.4.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.76	1.39	2.16	0.08	< 0.005	—	4.67

Unrefrigerated Warehouse-No	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	0.76	1.39	2.16	0.08	< 0.005	—	4.67
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.76	1.39	2.16	0.08	< 0.005	—	4.67
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	0.76	1.39	2.16	0.08	< 0.005	—	4.67
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.13	0.23	0.36	0.01	< 0.005	—	0.77
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	0.13	0.23	0.36	0.01	< 0.005	—	0.77

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	19.5	0.00	19.5	1.95	0.00	—	68.4
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	19.8	0.00	19.8	1.97	0.00	—	69.1
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	39.3	0.00	39.3	3.93	0.00	—	138
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	19.5	0.00	19.5	1.95	0.00	—	68.4
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	19.8	0.00	19.8	1.97	0.00	—	69.1
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Total	—	—	—	—	—	—	—	—	—	—	—	39.3	0.00	39.3	3.93	0.00	—	138
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	3.24	0.00	3.24	0.32	0.00	—	11.3
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	3.27	0.00	3.27	0.33	0.00	—	11.4
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	6.51	0.00	6.51	0.65	0.00	—	22.8

4.5.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	19.5	0.00	19.5	1.95	0.00	—	68.4
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	19.8	0.00	19.8	1.97	0.00	—	69.1
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	39.3	0.00	39.3	3.93	0.00	—	138

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	19.5	0.00	19.5	1.95	0.00	—	68.4
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	19.8	0.00	19.8	1.97	0.00	—	69.1
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	39.3	0.00	39.3	3.93	0.00	—	138
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	3.24	0.00	3.24	0.32	0.00	—	11.3
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	3.27	0.00	3.27	0.33	0.00	—	11.4
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	6.51	0.00	6.51	0.65	0.00	—	22.8

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequest ered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequest ered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	3/31/2025	4/11/2025	5.00	10.0	Removal of existing building, fencing, and other structures
Site Preparation	Site Preparation	4/15/2025	4/28/2025	5.00	10.0	Removing of vegetation
Grading	Grading	4/29/2025	5/19/2025	5.00	15.0	Excavation of building footprints and driveways
Building Construction	Building Construction	5/20/2025	12/8/2025	5.00	145	Construction of nine storage structures
Paving	Paving	12/9/2025	1/5/2026	5.00	20.0	Installation of asphalt over exposed areas
Architectural Coating	Architectural Coating	1/6/2026	2/2/2026	5.00	20.0	Painting of all exterior and limited interior surfaces

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40

Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

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5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38

Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	10.8	LDA,LDT1,LDT2
Demolition	Vendor	2.00	7.17	HHDT,MHDT
Demolition	Hauling	4.90	20.0	HHDT
Demolition	Onsite truck	1.00	0.50	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	10.8	LDA,LDT1,LDT2
Site Preparation	Vendor	2.00	7.17	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT

Site Preparation	Onsite truck	2.00	2.00	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	10.8	LDA,LDT1,LDT2
Grading	Vendor	2.00	7.17	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	1.00	2.00	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	53.8	10.8	LDA,LDT1,LDT2
Building Construction	Vendor	25.6	7.17	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	1.00	2.00	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	10.8	LDA,LDT1,LDT2
Paving	Vendor	2.00	7.17	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	0.00	2.00	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	10.8	10.8	LDA,LDT1,LDT2
Architectural Coating	Vendor	2.00	7.17	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	1.00	1.00	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	10.0	LDA,LDT1,LDT2
Demolition	Vendor	2.00	7.17	HHDT,MHDT

Demolition	Hauling	4.90	20.0	HHDT
Demolition	Onsite truck	1.00	0.50	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	10.0	LDA,LDT1,LDT2
Site Preparation	Vendor	2.00	7.17	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	2.00	2.00	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	10.0	LDA,LDT1,LDT2
Grading	Vendor	2.00	7.17	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	1.00	2.00	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	53.8	10.0	LDA,LDT1,LDT2
Building Construction	Vendor	25.6	7.17	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	1.00	2.00	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	10.0	LDA,LDT1,LDT2
Paving	Vendor	2.00	7.17	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	0.00	2.00	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	10.8	10.0	LDA,LDT1,LDT2
Architectural Coating	Vendor	2.00	7.17	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	1.00	1.00	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	234,000	78,000	17,714

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	4,250	—
Site Preparation	0.00	0.00	15.0	0.00	—
Grading	0.00	0.00	15.0	0.00	—
Paving	0.00	0.00	0.00	0.00	6.78

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
General Office Building	0.00	0%
Unrefrigerated Warehouse-No Rail	0.00	0%
Other Asphalt Surfaces	6.78	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	488	0.03	< 0.005
2026	0.00	392	0.03	< 0.005

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5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
General Office Building	380	86.2	27.3	104,953	2,530	574	182	698,890
Unrefrigerated Warehouse-No Rail	67.9	67.9	67.9	24,769	452	452	452	164,939

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
General Office Building	380	86.2	27.3	104,953	2,530	574	182	698,890
Unrefrigerated Warehouse-No Rail	67.9	67.9	67.9	24,769	452	452	452	164,939

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	234,000	78,000	17,714

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)

General Office Building	1,591,200	392	0.0330	0.0040	2,492,100
Unrefrigerated Warehouse-No Rail	198,900	392	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	392	0.0330	0.0040	0.00

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
General Office Building	1,591,200	392	0.0330	0.0040	2,492,100
Unrefrigerated Warehouse-No Rail	198,900	392	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	392	0.0330	0.0040	0.00

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5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
General Office Building	397,800	0.00
Unrefrigerated Warehouse-No Rail	0.00	0.00
Other Asphalt Surfaces	0.00	612

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
General Office Building	397,800	0.00
Unrefrigerated Warehouse-No Rail	0.00	0.00
Other Asphalt Surfaces	0.00	612

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
General Office Building	36.3	—
Unrefrigerated Warehouse-No Rail	36.7	—
Other Asphalt Surfaces	0.00	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
General Office Building	36.3	—
Unrefrigerated Warehouse-No Rail	36.7	—
Other Asphalt Surfaces	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
General Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
General Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
General Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00

General Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	21.5	annual days of extreme heat
Extreme Precipitation	1.85	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	0	0	0	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	1	1	1	2
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	67.9
AQ-PM	55.2
AQ-DPM	66.1
Drinking Water	97.8
Lead Risk Housing	25.9

Pesticides	85.4
Toxic Releases	47.3
Traffic	39.3
Effect Indicators	—
CleanUp Sites	63.7
Groundwater	54.5
Haz Waste Facilities/Generators	69.4
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	48.8
Cardio-vascular	34.4
Low Birth Weights	7.06
Socioeconomic Factor Indicators	—
Education	45.2
Housing	26.7
Linguistic	28.0
Poverty	51.1
Unemployment	19.6

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	38.41909406
Employed	19.97946875
Median HI	35.35223919

Education	—
Bachelor's or higher	37.80315668
High school enrollment	9.880662133
Preschool enrollment	31.09200565
Transportation	—
Auto Access	28.53843193
Active commuting	12.92185294
Social	—
2-parent households	40.25407417
Voting	50.1347363
Neighborhood	—
Alcohol availability	58.14192224
Park access	60.65699987
Retail density	66.43141281
Supermarket access	74.25895034
Tree canopy	74.54125497
Housing	—
Homeownership	47.73514693
Housing habitability	34.94161427
Low-inc homeowner severe housing cost burden	91.26138843
Low-inc renter severe housing cost burden	12.03644296
Uncrowded housing	49.60862312
Health Outcomes	—
Insured adults	63.35172591
Arthritis	10.3
Asthma ER Admissions	51.0
High Blood Pressure	12.9

Cancer (excluding skin)	25.9
Asthma	21.6
Coronary Heart Disease	17.4
Chronic Obstructive Pulmonary Disease	11.3
Diagnosed Diabetes	43.0
Life Expectancy at Birth	9.7
Cognitively Disabled	19.2
Physically Disabled	11.3
Heart Attack ER Admissions	53.6
Mental Health Not Good	31.0
Chronic Kidney Disease	20.1
Obesity	21.1
Pedestrian Injuries	19.6
Physical Health Not Good	32.1
Stroke	22.5
Health Risk Behaviors	—
Binge Drinking	41.7
Current Smoker	24.8
No Leisure Time for Physical Activity	41.3
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	47.4
Elderly	31.3
English Speaking	93.2
Foreign-born	16.1
Outdoor Workers	27.4

Climate Change Adaptive Capacity	—
Impervious Surface Cover	46.0
Traffic Density	49.7
Traffic Access	0.0
Other Indices	—
Hardship	65.5
Other Decision Support	—
2016 Voting	49.9

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	41.0
Healthy Places Index Score for Project Location (b)	28.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Building 1 is a planned three story structure. Footprint is 39,000 SF but total building area is 117,000 SF
Construction: Construction Phases	It is anticipated that demolition of onsite structures would occur in 2025 around the same time as site prep work.
Operations: Energy Use	General office building - will be a temperature controlled storage facility that primarily uses electricity for cooling and hot water heater (for public/staff restroom only) and natural gas for heating. Electricity Rate is based on 2018 CBECS Survey results for Office space (Annual consumption - 13.6 kWh/sf for electricity; 21.3 cubic feet/sf for natural gas) Unrefrigerated Warehouse - will be non-temperature controlled storage buildings that will primarily use electricity for lights only. Rate is based on 2018 CBECS Survey results for self storage spaces (Annual consumption 5.1 kWh/sf)
Operations: Water and Waste Water	Self Storage facilities will have minimal water use, estimated at 3.4 gallons per square foot per USEPA WaterSense Report (June 2023; US Water Use Intensity by Property Type).

CENTRAL CALIFORNIA INFORMATION CENTER
California Historical Resources Information System
Department of Anthropology – California State University, Stanislaus
One University Circle, Turlock, California 95382
(209) 667-3307

Alpine, Calaveras, Mariposa, Merced, San Joaquin, Stanislaus & Tuolumne Counties

Date: 7/28/2023

Records Search File #: 12610N
Project: Rezone Application, Stanislaus County
APN 046-010-024 & 046-010-016, NE ¼
Section 5, T3S R9E

Zulema Longoria, Planner
AMERCO Real Estate Company
2727 N. Central Avenue
Phoenix, AZ 85004
602-263-6502 zulema_longoria@uhaul.com

Dear Ms. Longoria:

We have conducted a non-confidential extended records search as per your request for the above-referenced project area located on the Riverbank USGS 7.5-minute quadrangle map in Stanislaus County.

Search of our files includes review of our maps for the specific project area and the immediate vicinity of the project area, and review of the following:

National Register of Historic Places (NRHP)
California Register of Historical Resources (CRHR)
California Inventory of Historic Resources (1976)
California Historical Landmarks
California Points of Historical Interest listing
Office of Historic Preservation Built Environment Resource Directory (BERD) and the Archaeological Resources Directory (ARD)
Survey of Surveys (1989)
Caltrans State and Local Bridges Inventory
General Land Office Plats
Other pertinent historic data available at the CCaIC for each specific county

The following details the results of the records search:

Prehistoric or historic resources within the project area:

- There are no prehistoric or historic archaeological resources formally reported to the Information Center.

- There is one formally recorded 1920s Craftsman-style house with a detached garage at 4843 McHenry Avenue (P-50-002261) (CCaIC Report ST-05502). When this resource was recorded it was being used as the office and out-buildings for Roberts Auto Sales.

The resource has a National Register of Historic Places (NRHP) status rating of "6Z"- found ineligible for the NRHP, the California Register of Historical Resources, and for local listing through survey evaluation.

- The General Land Office survey plat for T3S R9E (dated 1854) shows the NE ¼ of Section 5 divided into two parcels, 80 acres on the south and 83.81 acres on the north.

- The Official Map of the County of Stanislaus, California (1906) shows the historic landowner at that time as "D. T. Bangs".

- The 1916 edition of the Riverbank USGS map shows the alignment of McHenry Ave.

- The 1953 edition of the Riverbank USGS quadrangle shows buildings, and orchard and the alignment of McHenry and Kiernan avenues.

- The 1969 edition of the Riverbank USGS quadrangle references additional buildings within the project area.

Prehistoric or historic resources within the immediate vicinity of the project area: None have been formally reported, but we caution that prehistoric and historic archaeological resources have been found in subsurface context elsewhere with the City of Modesto.

Resources that are known to have value to local cultural groups: None has been formally reported to the Information Center.

Previous investigations within the project area: No project-specific survey has been conducted, but six reports document larger investigations that included the project area:

Sharp, J., K. Hovey, and L. Nishimura (Caltrans District 10)
1999 *Department of Transportation Negative Archaeological Survey Report, 10-STA-219, P.M. 0.1/4.9.*
CCaIC Report ST-03697

Sharp, J. (California Department of Transportation)
2000 *Department of Transportation Negative Archaeological Survey Report- First Supplemental Survey, 10-STA-219, P.M. 0.1/4.9, EA 0A8700, Widening of Route 219.*
CCaIC Report ST-04054

Leach-Palm, L., P. Mikkelsen, J. King, J. Hatch, and B. Larson (Far Western Anthropological Research Group, Inc.; for Caltrans District 10)
2004 *Cultural Resources Inventory of Caltrans District 10 Rural Conventional Highways; Volume l: Summary of Methods and Findings.*
CCaIC Report ST-05498

Rosenthal, J. S. and J. Meyer (Far Western Anthropological Research Group, Inc.; for Caltrans District 10)

2004 *Cultural Resources Inventory of Caltrans District 10 Rural Conventional Highways; Volume III: Geoarchaeological Study.*
CCaIC Report ST-05501

Leach-Palm, L., J. King, J. Hatch, and B. Larson (Far Western Anthropological Group, Inc. et al.; for Caltrans District 10)

2004 *Cultural Resources Inventory of Caltrans District 10 Rural Conventional Highways; Volume II G: Stanislaus County.*
CCaIC Report ST-05502

Waechter, S. and M. Bunse (Far Western A.R.G, Inc.& JRP Historical Consulting; for Circle Point and Stanislaus Council of Governments)

2007 *North County Corridor Environmental Constraints Analysis: Cultural Resources.*
CCaIC Report ST-07244

Recommendations/Comments:

Please be advised that a historical resource is defined as a building, structure, object, prehistoric or historic archaeological site, or district possessing physical evidence of human activities over 45 years old.

If the current project does not include ground disturbance, further study for archaeological resources is not recommended at this time. If ground disturbance is considered a part of the current project, we recommend further review for the possibility of identifying prehistoric or historic-era archaeological resources.

If the proposed project contains buildings or structures that meet the minimum age requirement (45 years in age or older) it is recommended that the resource/s be assessed by a professional familiar with architecture and history of the county. Review of the available historic building/structure data has included only those sources listed above and should not be considered comprehensive.

If at any time you might require the services of a qualified professional the Statewide Referral List for Historical Resources Consultants is posted for your use on the internet at http://chrisinfo.org

If archaeological resources are encountered during project-related activities, work should be temporarily halted in the vicinity of the discovered materials and workers should avoid altering the materials and their context until a qualified professional archaeologist has evaluated the situation and provided appropriate recommendations. Project personnel should not collect cultural resources.

If human remains are discovered, California Health and Safety Code Section 7050.5 requires you to protect the discovery and notify the county coroner, who will determine if the find is Native American. If the remains are recognized as Native American, the coroner shall then notify the Native American Heritage Commission (NAHC). California Public Resources Code Section 5097.98 authorizes the NAHC to appoint a Most Likely Descendant (MLD) who will make recommendations for the treatment of the discovery.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the State Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the CHRIS Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

We thank you for contacting this office regarding historical resource preservation. Please let us know when we can be of further service. Thank you for sending the signed **Access Agreement Short Form.**

Note: Billing will be transmitted separately via email from the Financial Services office ($150.00), payable within 60 days of receipt of the invoice.

If you wish to include payment by Credit Card, you must wait to receive the official invoice from Financial Services so that you can reference the CMP # (Invoice Number), and then contact the link below:

https://commerce.cashnet.com/ANTHROPOLOGY

Sincerely,

E. A. Greathouse

E. A. Greathouse, Coordinator
Central California Information Center
California Historical Resources Information System

* Invoice Request sent to: ARBilling@csustan.edu, CSU Stanislaus Financial Services

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
1010 10TH Street, Suite 3400, Modesto, CA 95354
Planning Phone: (209) 525-6330 Fax: (209) 525-5911
Building Phone: (209) 525-6557 Fax: (209) 525-7759

NEGATIVE DECLARATION

NAME OF PROJECT: Rezone Application No. PLN2023-0093 – U-Haul

LOCATION OF PROJECT: 4843 McHenry Avenue (State Route 108), between Kiernan Avenue (State Route 219) and Bang Avenue, within the Sphere of Influence of the City of Modesto. APNs: 046-010-016 and 046-010-024.

PROJECT DEVELOPERS: Chris Trudell, U-Haul
255A Northgate Drive
Manteca, CA 95336

DESCRIPTION OF PROJECT: Request to rezone two parcels totaling 8.57± acres from Planned Development (P-D) (254) and General Agriculture (A-2-10) to a new P-D, to allow for development of a mini-storage and moving vehicle rental facility.

Based upon the Initial Study, dated **March 5, 2025**, the Environmental Coordinator finds as follows:

1. This project does not have the potential to degrade the quality of the environment, nor to curtail the diversity of the environment.

2. This project will not have a detrimental effect upon either short-term or long-term environmental goals.

3. This project will not have impacts which are individually limited but cumulatively considerable.

4. This project will not have environmental impacts which will cause substantial adverse effects upon human beings, either directly or indirectly.

The Initial Study and other environmental documents are available for public review at the Department of Planning and Community Development, 1010 10th Street, Suite 3400, Modesto, California.

Initial Study prepared by: Kristen Anaya, Senior Planner

Submit comments to: Stanislaus County
Planning and Community Development Department
1010 10th Street, Suite 3400
Modesto, California 95354

commercialarch

April 8, 2025

Kristen Anaya, Senior Planner
Stanislaus County Department of Planning and Community Development
1010 10th Street, Suite 3400
Modesto, CA 95354

RE: CEQA Referral Comments on Rezone Application No. PLN2023-0093 – U-Haul

Dear Ms. Anaya,

On behalf of the owner of Stanislaus County Assessor Parcel Number (APN) 046-010-017, we respectfully submit the following comments regarding the Initial Study and proposed Negative Declaration for Rezone Application No. PLN2023-0093 – U-Haul, located at 4843 McHenry Avenue.

We appreciate the opportunity to participate in the public review process and wish to bring forward two items for the County's consideration and incorporation into the project conditions and analysis:

1. Cul-de-sac Access Through APN 046-010-017
   It has come to our attention that the project materials may indicate a proposed cul-de-sac connection extending into or across APN 046-010-017. We respectfully request that this proposed road be clearly labeled as "Future" and that it not be approved for construction or access unless and until a formal development application is submitted for our parcel (046-010-017). Installation of this road would be premature, potentially impact the future development potential of our property, and would constitute an unnecessary encumbrance.

2. Impact of North County Corridor, Phase 4 on APN 046-010-024
   We would also like to ensure that the applicant is aware of the County's long-range plans for the North County Corridor project. Based on current corridor planning, Phase 4 of this County-wide transportation improvement is expected to significantly affect the existing layout of APN 046-010-024. It is our understanding that a substantial portion of this parcel may be required for the future roadway right-of-way, potentially eliminating a significant portion of the proposed building and/or site improvements. We encourage the County to disclose this potential future impact to the applicant and ensure the project's design and entitlements are aligned with the anticipated changes in access and property configuration due to the North County Corridor.

Thank you for your consideration of these important items. We ask that both concerns be addressed in the final documentation and project conditions to ensure appropriate coordination of development activity in this area.

Please feel free to contact us with any questions or for additional clarification.
Sincerely,

Sincerely,

Stacey Wellnitz, Architect
swellnitz@commercialarch.com

cc: Dennis Noland, Doug Roberts, Dennis Wilson

209.571.8158

616 14th street
modesto • california • 95354

www.commercialarch.com

EXHIBIT G

PARCEL MAP

BEING A DIVISION OF PARCEL "B" AS SHOWN ON THE MAP FILED IN BOOK 32 OF PARCEL MAPS, AT PAGE 67, STANISLAUS COUNTY RECORDS, AND LYING IN THE NORTHEAST QUARTER OF SECTION 5, T.3S., R.9E., M.D.B.&M. STANISLAUS COUNTY, CALIFORNIA.

SCALE: 1" = 150'

DECEMBER, 1986

MID-VALLEY ENGINEERING
900 "H" STREET ~ SUITE "G"
MODESTO, CALIFORNIA 95354

OWNERS' CERTIFICATE:
We, **JAN LEHMANN** and **ESTHER LEHMANN**, husband and wife, as community property, as owners; and **SAFECO TITLE INSURANCE COMPANY**, a California corporation, as trustee, hereby certify that we are the owners of, or have some right, title or interest of record in the land shown on this map, and we consent to the making and filing of this map in the office of the County Recorder of Stanislaus County, California. We also offer for dedication to the Modesto Irrigation District the 20 foot wide M.I.D. Easement and the 10 foot wide irrigation easement, both as shown on this map.

Dated this 15 day of DECEMBER, 1986.

OWNERS: **JAN LEHMANN** [signature] **ESTHER LEHMANN** Esther Lehmann

TRUSTEE: **SAFECO TITLE INSURANCE COMPANY**, a California corporation
Gary C. Damsen, Vice Pres. Louise Ekelund, Asst. Sec.

STATE OF CALIFORNIA
COUNTY OF STANISLAUS } **SS.**
On this 15th day of DECEMBER, 1986, before me, a Notary Public in and for said County and State, duly sworn and commissioned, personally appeared **JAN LEHMANN** and **ESTHER LEHMANN**,
☐ personally known to me, or
☒ proved to me, on the basis of satisfactory evidence, to be the persons whose names are subscribed to the within instrument, and acknowledged to me that they executed it.
Witness My Hand and Official Seal:
Doris D. Gioni
NOTARY PUBLIC

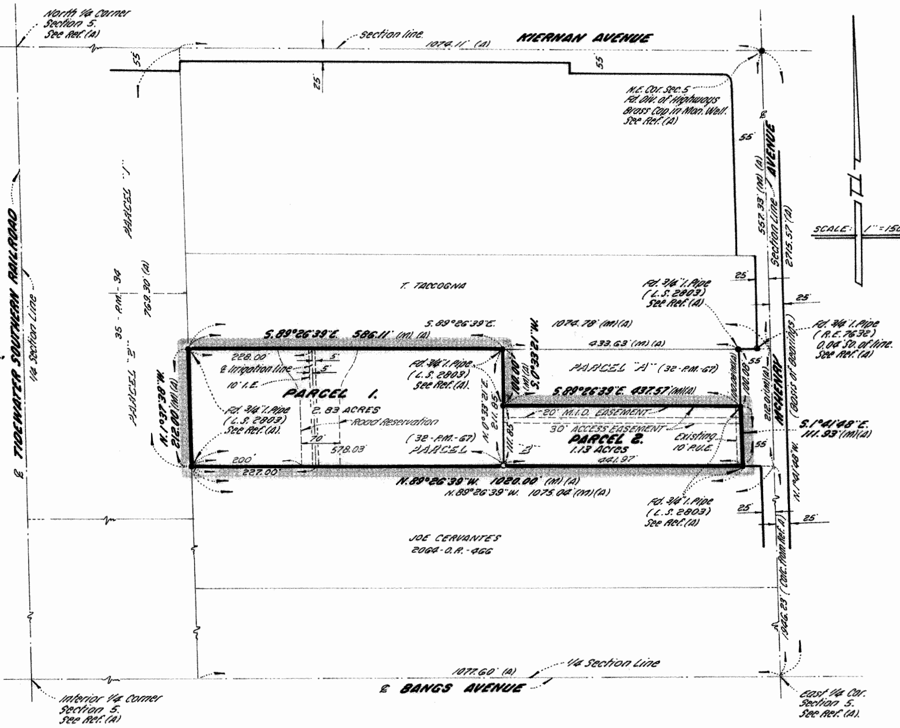
DORIS D. GIONI
NOTARY PUBLIC - CALIFORNIA
PRINCIPAL OFFICE IN
STANISLAUS COUNTY
My Commission Expires June 16, 1989

STATE OF CALIFORNIA
COUNTY OF STANISLAUS } **SS.**
On this 17th day of December, 1986, before me, a Notary Public in and for said County and State, duly sworn and commissioned, personally appeared Gary C. Damsen and Louise Ekelund,
☒ personally known to me, or
☐ proved to me, on the basis of satisfactory evidence, to be the persons who executed the within instrument as Vice President and Asst Secretary, respectively of **SAFECO TITLE INSURANCE COMPANY**, a California corporation, or on behalf of the corporation therein named, and acknowledged to me that the corporation executed it.

Witness My Hand and Official Seal:
[signature]
NOTARY PUBLIC

OFFICIAL SEAL
S. A. COTTEN
NOTARY PUBLIC - CALIFORNIA
PRINCIPAL OFFICE IN
STANISLAUS COUNTY
My Commission Expires March 11, 1988

NOTE:
The signature of the following easement holders have been omitted pursuant to Section 66436 of the Subdivision Map Act:
GRACE E. ENDERS, CAROLINA V. GLASS, GEORGIANNA LYONS, ELIZABETH J. HIGGINS, FRANCES J. WELLS, VITAL W. BANGS, and **CLARENCE R. BANGS**, pertaining to a reservation contained in a petition deed for right of way for the construction of a ditch necessary for the irrigation of any of the other tracts of land, recorded in Vol. 223 of Deeds, Pg. 85, Stanislaus County Records.



SURVEYOR'S STATEMENT:
This map was prepared by me or under my direction and is based upon a field survey in conformance with the requirements of the Subdivision Map Act and local ordinance at the request of **JAN LEHMANN**, in April, 1986. I hereby state that this parcel map substantially conforms to the approved or conditionally approved tentative map, if any, and all monuments are of the character and occupy the positions indicated. The monuments are sufficient to enable the survey to be retraced.
Dated this 17th day of December, 1986.
Jimmy G. Bateman
JIMMY G. BATEMAN, L.S. 4685.

LICENSED LAND SURVEYOR
JIMMY G. BATEMAN
No. 4685
STATE OF CALIFORNIA

COUNTY SURVEYOR'S STATEMENT:
This map conforms to the requirements of the Subdivision Map Act and local ordinance.
Dated this 22nd day of December, 1986.

H. R. CALLAHAN, COUNTY SURVEYOR

By: J. Ray Edwards, Deputy.

REGISTERED PROFESSIONAL ENGINEER
J. RAY EDWARDS
No. 18573
Exp. 6-30-89
CIVIL
STATE OF CALIFORNIA

LEGEND:

—o—	Set 3/4" iron pipe with plastic plug in top stamped "L.S. 4685."
—●—	Found monument as noted.
(m)	Measured on this survey. All distances are measured unless noted otherwise.
P.U.E.	Public Utility Easement.
(A)	Record as per Bk. 32 of Parcel Maps, Pg. 67, Stan. Co. Records.
I.E.	Irrigation Easement.

TAX COLLECTOR'S CERTIFICATE:
This is to certify that there are no liens for any unpaid State, County, School, Municipal or Irrigation taxes, or special assessments, except special assessments or taxes not yet payable against the land shown on this map. 046-0139-490

AS TO STATE, COUNTY, SCHOOL OR MUNICIPAL TAXES:
Dated this 17th day of December, 1986.
DON FAIRCHILDS, COUNTY TAX COLLECTOR.

By: Marcia Lorean, Deputy.

AS TO IRRIGATION TAXES:
Dated this ____ day of ________, 198__.

TAX COLLECTOR, MODESTO IRRIGATION DISTRICT

CLERK OF THE BOARD OF SUPERVISOR'S CERTIFICATE:
This is to certify that the owners of the property shown on this map have filed with the Board of Supervisors: (check one)
☐ A. A bond or deposit approved by said Board to secure the payment of taxes and special assessments collected as taxes which are at the time of filing this map, a lien against said property or any part thereof.
☒ B. Receipted tax bill or bills or such other evidence as may be required by said Board showing full payment of all applicable taxes.
Dated this 17th day of December, 1986.

CLAUDIA LEONG, CLERK/MANAGER, BOARD OF SUPERVISORS

By: Patricia A Minton
DEPUTY

BOARD OF SUPERVISORS
STANISLAUS COUNTY CAL.

BASIS OF BEARINGS:
The bearing of N. 1°41'48" W. for the centerline of McHenry Avenue (Section Line) as shown on the map filed in Book 32 of Parcel Maps, at Page 67, Stanislaus County Records, was used as the basis of all bearings shown on this map.

RECORDER'S CERTIFICATE:
Filed this 23 day of Dec, 1986, at 2:20 o'clock P.M., in Book 39 of PARCEL MAPS, at Page 12, Stanislaus County Records, at the request of **JIMMY G. BATEMAN.**

Instrument No. 45172
Fee 6.00 Paid.

DAVID A. WURM, COUNTY RECORDER

By: Pat Seidel, Deputy

Stanislaus County File No. 86-35

JOB NO. 50-744 B

39-PM-12

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EXHIBIT H

SUMMARY OF RESPONSES FOR ENVIRONMENTAL REVIEW REFERRALS

PROJECT: REZONE APP. NO. PLN2023-0093 - UHAUL

REFERRED TO:				RESPONDED		RESPONSE			MITIGATION MEASURES		CONDITIONS	
	2 WK	30 DAY	PUBLIC HEARING NOTICE	YES	NO	WILL NOT HAVE SIGNIFICANT IMPACT	MAY HAVE SIGNIFICANT IMPACT	NO COMMENT NON CEQA	YES	NO	YES	NO
CA DEPT OF FISH & WILDLIFE	X	X	X		X							
CA DEPT OF TRANSPORTATION DIST 10	X	X	X		X					X	X	
CA OPR STATE CLEARINGHOUSE	X	X	X		X			X		X		X
CITY OF: MODESTO	X	X	X	X				X		X	X	
FIRE PROTECTION DIST: SALIDA	X	X	X	X				X		X	X	
IRRIGATION DISTRICT: MODESTO	X	X	X	X				X		X	X	
MOSQUITO DISTRICT:EASTSIDE	X	X	X		X					X		X
STAN CO EMERGENCY MEDICAL	X	X	X		X			X		X		X
PACIFIC GAS & ELECTRIC	X	X	X		X			X		X		X
SAN JOAQUIN VALLEY APCD	X	X	X	X				X		X	X	
SCHOOL DISTRICT 1: MODESTO CITY SCHOOLS	X	X	X		X			X		X		X
STAN CO ALUC	X	X	X	X				X		X	X	
STAN CO BUILDING PERMITS DIVISION	X	X	X		X					X		X
STAN CO CEO	X	X	X		X			X		X		X
STAN CO DER	X	X	X	X				X		X	X	
STAN CO DER GROUNDWATER	X	X	X		X					X		X
STAN CO HAZARDOUS MATERIALS	X	X	X	X				X		X	X	
STAN CO PARKS & RECREATION		X	X		X			X		X		X
STAN CO PUBLIC WORKS	X	X	X	X				X		X	X	
STAN CO SHERIFF	X	X	X		X			X		X		X
STAN CO SUPERVISOR DIST #4: GREWAL	X	X	X		X			X		X		X
STAN COUNTY COUNSEL	X	X	X		X			X		X		X
STANISLAUS FIRE PREVENTION BUREAU	X	X	X		X			X		X		X
STANISLAUS LAFCO	X	X	X	X						X	X	
SURROUNDING LAND OWNERS AND RESIDENTS	X	X	X	X				X		X		X
TELEPHONE COMPANY: AT&T	X	X	X		X			X		X		X
TRIBAL CONTACTS (CA Government Code §65352.3)	X	X	X	X				X		X		X
TUOLUMNE RIVER TRUST	X	X	X		X			X		X		X

I:\Planning\Staff Reports\REZ\2023\REZ PLN2023-0093 - U-HAUL\Planning Commission\May 1, 2025\Staff Report\Exhibit I - Environmental Review Referrals.xls

COUNTY OF STANISLAUS CAMPAIGN CONTRIBUTION DISCLOSURE FORM
PLANNING & COMMUNITY DEVELOPMENT DEPARTMENT

Application Number: PLN2023-0093
Application Title: U-Haul
Application Address: Kiernan Ave & McHenry Ave
Application APN: 046-010-024 / 046-010-016

Was a campaign contribution, regardless of the dollar amount, made to any member of a decision-making body involved in making a determination regarding the above application (i.e. Stanislaus County Board of Supervisors, Planning Commission, Airport Land Use Commission, or Building Code Appeals Board), hereinafter referred to as Member, during the 12-month period preceding the filing of the application, by the applicant, property owner, or, if applicable, any of the applicant's proposed subcontractors or the applicant's agent or lobbyist?

Yes ☐ No ☒

If no, please sign and date below.

If yes, please provide the following information:

Applicant's Name: _____

Contributor or Contributor Firm's Name: _____

Contributor or Contributor Firm's Address: _____

Is the Contributor:

The Applicant	Yes ☐ No ☒
The Property Owner	Yes ☐ No ☒
The Subcontractor	Yes ☐ No ☒
The Applicant's Agent/ Lobbyist	Yes ☐ No ☒

Note: Under California law as implemented by the Fair Political Practices Commission, campaign contributions made by the Applicant and the Applicant's agent/lobbyist who is representing the Applicant in this application or solicitation must be aggregated together to determine the total campaign contribution made by the Applicant.

Identify the Member(s) to whom you, the property owner, your subcontractors, and/or agent/lobbyist made campaign contributions during the 12-month period preceding the filing of the application, the name of the contributor, the dates of contribution(s) and dollar amount of the contribution. Each date must include the exact month, day, and year of the contribution.

Name of Member: _____

Name of Contributor: _____

Date(s) of Contribution(s): _____

Amount(s): _____

(Please add an additional sheet(s) to identify additional Member(s) to whom you, the property owner, your subconsultants, and/or agent/lobbyist made campaign contributions)

By signing below, I certify that the statements made herein are true and correct. I also agree to disclose to the County any future contributions made to Member(s) by the applicant, property owner, or, if applicable, any of the applicant's proposed subcontractors or the applicant's agent or lobbyist after the date of signing this disclosure form, and within 12 months following the approval, renewal, or extension of the requested license, permit, or entitlement to use.

4/23/2025
Date

[redacted]
Signature of Applicant

U-Haul Company of Central Valley
Print Firm Name if applicable

Chris Trudell
Print Name of Applicant

EXHIBIT J