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First Carbon Solutions
Memo Dated November 10, 2025

Memorandum

Date: November 10, 2025

To: Dennis Paulley, E&P Properties, Inc.

From: Jason Brandman, Sr. Vice President, Environmental Services, FirstCarbon Solutions

Subject: Responses to Comments for the E&P Technology Way Buildings A and B Project Initial Study/Mitigated Negative Declaration

Responses to Comments

The FirstCarbon Solutions (FCS) team has been requested to respond to comments received during the public comment period from October 19, 2024 to November 20, 2024 regarding the E&P Technology Way Buildings A and B Project Initial Study/Mitigated Negative Declaration (IS/MND) (State Clearinghouse [SCH] No. 2024100855). The list of relevant commenters on the proposed E&P Technology Way Buildings A and B Project (proposed project) is presented below. Each comment has been assigned an author code. Individual comments within each communication have been numbered so comments can be cross-referenced with responses. Comment Letters are included in the attachments to this memorandum.

List of Commenters

State Agencies

California Department of Fish and Wildlife (11-15-24).....CDFW

Organizations

Adams Broadwell Joseph & Cardoza (11-14-24)
On behalf of the Napa-Solano Residents for Responsible Development.....NSRRD1

Adams Broadwell Joseph & Cardoza (11-19-24)
On behalf of the Napa-Solano Residents for Responsible Development.....NSRRD2

This memorandum also contains an Errata section where clarifying information and revisions to the IS/MND are provided for incorporation into the Final IS/MND. These revisions represent minor technical changes, updates and clarification. None of the information provided in this memorandum or the Errata section include information requiring recirculation of the IS/MND.

State Agencies

California Department of Fish and Wildlife (CDFW)

Response to CDFW-1

CDFW confirms receipt of the IS/MND and confirms use permit and parcel numbers associated with the project. This comment is noted. No additional response is required.

Response to CDFW-2

CDFW clarifies their role as Trustee Agency and Responsible Agency. This comment is noted. No additional response is required.

Response to CDFW-3

The project proponent, objectives, and location are identified including parcel numbers and approximate dimensions of proposed buildings and parking areas. This comment is noted. No additional response is required.

Response to CDFW-4

The conditions under which an Incidental Take Permit (ITP) is required are provided. CDFW also states that the project has the potential to impact Swainson's hawk due to an observation of a nesting individual in 2021 approximately 300 feet north of the project site in the California Natural Diversity Database (CNDDDB) database, and burrowing owl due to an observation of a wintering individual in 2006 approximately 1,100 feet northeast of the project site in the CNDDDB database.

These comments are noted. Mitigation Measure (MM) BIO-6 in Section IV, Biological Resources, of the IS/MND has been revised to include changes recommended by CDFW (see Errata, Section IV Biological Resources below). This change reflects the recent status change of burrowing owl to a California Endangered Species Act (CESA) candidate species and stipulates that the proposed project would obtain a CESA ITP if take of burrowing owl cannot be avoided. This will further ensure that biological impacts remain less than significant. This change would not result in a new significant environmental impact. Additionally, MM BIO-6 has been revised to include language on the provisions for an ITP (see Errata, Section IV Biological Resources below).

Implementation of MM BIO-6, as recommended by CDFW, would ensure that biological impacts remain less than significant. This nominal modification merely clarifies and amplifies the analysis and would not trigger any new significant impacts or an increase in any previously identified significant impacts.

Response to CDFW-5

The jurisdiction of CDFW over natural resources governed by Fish and Game Code and the Migratory Bird Treaty Act is clarified. This comment is noted. No additional response is required.

Response to CDFW-6

CDFW introduces the subsequent discussion of recommended Avoidance and Mitigation Measures (AMM) and concludes that an IS/MND is appropriate for the project provided suitable AMM are implemented.

This comment is noted. Responses to specific recommended AMM are provided below (see Responses to CDFW-7 and CDFW-8). No additional response is required.

Response to CDFW-7

CDFW states that language in the IS/MND and FCS (2024) biological assessment does not reflect the recent status of change of burrowing owl under CESA. CDFW recommends adding language to MM BIO-6 that specifies the conditions under which an ITP is warranted.

This comment is noted. As stated in Response to CDFW-4, MM BIO-6 in Section IV, Biological Resources, of the IS/MND has had language added to include changes recommended by CDFW (see Errata, Section IV Biological Resources below). This addition reflects the recent status change of burrowing owl to a CESA candidate species and stipulates that the proposed project would obtain a CESA ITP if take of burrowing owl cannot be avoided. Additionally, MM BIO-6 has been revised to include language on the provisions for an ITP (see Errata, Section IV Biological Resources below). Implementation of MM BIO-6, as recommended by CDFW, will further ensure that biological impacts remain less than significant. This nominal modification merely clarifies and amplifies the analysis and would not trigger any new significant impacts or an increase in any previously identified significant impacts.

Response to CDFW-8

CDFW provides an editorial comment that describes the conditions under which an ITP for Swainson's hawk may be warranted. CDFW recommends modifying language from the IS/MND to reflect that the project has the potential for "take" as defined under CESA of burrowing owl and Swainson's hawk.

As stated in Response to CDFW-4, the IS/MND Page 2, Section 10 has been revised to contain recommended language provided by CDFW. This language includes the provisions of an ITP and states that the proposed project has the potential to result in the take of listed endangered or threatened species, or candidate species for listing and thus may require a take permit from CDFW or the National Marine Fisheries Service (NOAA Fisheries) (see Errata, Section IV Biological Resources below). Implementation of this suggested language from CDFW will further ensure that biological impacts remain less than significant. This nominal modification merely clarifies and amplifies the analysis and would not trigger any new significant impacts or an increase in any previously identified significant impacts.

Response to CDFW-9

The requirements for submitting environmental data to databases including CNDDDB are discussed by the commenter. This comment is noted. No additional response is required.

Response to CDFW-10

Filing fees for submission of environmental documents as part of California Environmental Quality Act (CEQA) review are discussed by the commenter. This comment is noted. No additional response is required.

Response to CDFW-11

Contact information for CDFW personnel are presented by the commenter. This comment is noted. No additional response is required.

Organizations

Adams Broadwell Joseph & Cardoza on behalf of the Napa-Solano Residents for Responsible Development, dated November 14, 2024 (NSRRD1)

Response to NSRRD1-1

This comment requests an extension to the current public comment period based on the claim that the County failed to provide timely access to the supporting documents to the IS/MND. This comment also describes the proposed project, including the project proponent, objectives, and location, including parcel numbers and approximate dimensions of proposed buildings.

Contrary to the commenter's assertion, all supporting documentation, except the confidential Phase I Cultural Resource Assessment (Phase I CRA) was available on the County's website¹ and the link to those documents was included in the Notice of Planning Commission Hearing and Notice of Intent to Adopt a Negative Declaration.² Furthermore, it is stated in the Notice that "copies of documents and other information relating to the project described above may be examined between 8:00 a.m. and 4:00 p.m. Monday through Friday at the office of the Planning, Building, and Environmental Service Department, Napa County Administration Building, 1195 Third Street, Suite 210, Napa, California." The Phase I CRA contains sensitive information relating to cultural resources and is not intended for public distribution pursuant to Public Resources Code Section 21082.3(C)(2). This document is only available to qualified professionals upon request. Additionally, the County notes that the Public Records Act exempts from disclosure records "of Native American graves, cemeteries, and sacred places and records of Native American places, features and objects" described in Public Resources Code Sections 5097.9 and 5097.993. These confidentiality mandates take precedence over CEQA's disclosure policies. Government Code Section 6524(r); *Clover Valley Found. V. City of Rocklin* (2011) 197 CA4th 200, 221.

CEQA also specifically protects the confidentiality of information that is provided by a Tribe as part of the Assembly Bill (AB) 52 consultation process. Such information may not be disclosed to the public without the consent of the Tribe that provided the information. There is no such consent in this situation and, therefore, the County is precluded by law from disclosing confidential information.

Therefore, the County provided timely access to supporting documents to the IS/MND in full compliance with CEQA's requirements. Thus, no additional response is required.

¹ County of Napa. 2025. P22-00308 E&P Technology Way, Building B. Website: <https://www.pbcs.cloud/index.php/s/4DJdazPtwt7P6wN>. Accessed June 24, 2025

² County of Napa. 2024. Notice of Planning Commission Hearing and Notice of Intent to Adopt a Negative Declaration. October 18. Website: <https://ceqanet.lci.ca.gov/2024100855/Attachment/x0tGiK>. Accessed June 18, 2025.

Response to NSRRD1-2

This comment reiterates the previous comment's request for supporting documents for the IS/MND. Comment noted.

This comment is noted. See Response to NSRRD1-1. No additional response is required.

Response to NSRRD1-3

This comment claims that Phase I CRA conducted by FCS has not been provided for public review.

This comment is noted. As previously mentioned within Response to NSRRD1-1, the Phase I CRA contains sensitive information relating to cultural resources and is not intended for public distribution pursuant to Public Resources Code Section 21082.3(C)(2). This document is only available to qualified professionals upon request. Furthermore, the methodology and results of the Phase I CRA were provided in Section V. Cultural Resources of the IS/MND.

Response to NSRRD1-4

This comment reiterates the requests summarized by Response to NSRRD1-1 through Response to NSRRD1-3 for the provision of the Phase I CRA conducted by FCS and the extension of the public review period by at least 30 days.

This comment is noted. See Response to NSRRD1-1 and Response to NSRRD1-3. No additional response is required.

Response to NSRRD1-5

This comment requests the provision of all related project documents not provided for the public review period.

This comment is noted. See Response to NSRRD1-1 through Response to NSRRD1-3. The public review period for an IS/MND requires submission of a "mitigated negative declaration and initial study" for public and agency review. These guidelines do not specify the requirement of including all project documents, but require that documents incorporated by reference, per CEQA Guidelines Section 15072(g)(4) as cited in the comment, be "readily accessible to the public during the lead agency's normal working hours." The ruling cited in the comment, *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*, was brought under the plaintiffs' claims objecting to an Environmental Impact Report (EIR) prepared for the construction of a 22,000-unit mixed-use residential project. The plaintiffs claimed that "(1) the environmental impact report (EIR) prepared for the community and specific plans failed to adequately identify and evaluate future water sources for the development, and (2) potential impacts on migratory salmon in the Cosumnes River, disclosed in the Final EIR, should instead have been incorporated in a revised Draft EIR and recirculated for public comment." The ruling concluded that although the EIR prepared by the County (defendant) "identifies the intended water sources in general terms, it does not clearly and coherently explain, using material properly stated or incorporated in the EIR, how the long-term demand is likely to be met with those sources, the environmental impacts of exploiting those sources, and how those impacts are to be mitigated." The ruling also reiterated that the Draft EIR must be revised and recirculated for public comment based on the newly-disclosed information. Given that the holding for *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* case

addresses water resources, and does not remark on requirements related to the availability of documents incorporated by reference or for ensuring any related or referenced documents remain “readily accessible” to the public, the holding of *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* is unrelated to the proposed project. No additional response is required.

Response to NSRRD1-6

This comment reiterates the claims made by Response to NSRRD1-5, citing the California Public Records Act (Government Code § 7922.525(a)).

This comment is noted. See Response to NSRRD1-5. No additional response is required.

Adams Broadwell Joseph & Cardoza on behalf of the Napa-Solano Residents for Responsible Development, dated November 19, 2024 (NSRRD2)

Response to NSRRD2-1

This comment describes the proposed project, including the project proponent, objectives, parking area, utilities, and location, including parcel numbers and approximate dimensions of proposed buildings of the proposed project.

This comment is noted for the record. No additional response is required.

Response to NSRRD2-2

This comment introduces the intent of the comment letter and a brief summary of claims made by the comment letter asserting that the IS/MND lacks an adequate Project Description and fails to provide substantial evidence that the proposed project would not assert in significant environmental impacts. Based on these claims, the commenter claims that an EIR is required for the proposed project.

This comment is noted. CEQA Guidelines state that commenters on mitigated negative declarations should focus on the proposed finding that the project will not have a significant environmental effect (CEQA Guidelines § 15204(a)). This general comment fails to address the requirements of Section 15204(b) because it does not identify the specific effect the commenter alleges is significant, fails to explain why the commenter believes a significant effect would occur; and fails to explain why the effect would be significant. The commenter has not provided any credible evidence in this general comment to support a fair argument that there are significant impacts. The IS/MND, as well as all supporting technical studies, provide all required elements of a legally adequate Project Description, and all feasible mitigation measures for the proposed project’s impacts have been applied. Therefore, an EIR is not required. Thus, these claims remain unsubstantiated. No additional response is required.

Response to NSRRD2-3

Napa-Solano Residents for Responsible Development (NSRRD) introduces their role as an Organization.

This comment is noted for the record. The comment did not raise any issues with respect to the environmental analysis. No response additional is required.

Response to NSRRD2-4

This comment claims that the IS/MND fails the “fair argument” standard in disproving that the proposed project would avoid significant environmental impacts and that an EIR is required.

Comment noted. This comment does not reference the project-specific findings of the IS/MND; therefore, the comment is vague and unsubstantiated, lacking critical information or examples demonstrating the project’s lack of conformance with the CEQA “fair argument” standard. Given the lack of substantial evidence supporting a fair argument that impacts would result, no additional response is required.

Response to NSRRD2-5

The comment claims that the IS/MND fails to provide a complete Project Description due to the omission of details on the proposed project’s construction timeline, activities, the frequency and number of clients that would visit the building.

Comment noted. The commenter fails to establish basis for their comments and submit supporting data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts. Section 15204(c). Accordingly, this comment fails to establish “substantial evidence” sufficient to support a “fair argument” that the alleged impacts may occur and further fails to establish that the alleged impacts should be considered “significant.”

Neither CEQA nor the CEQA Guidelines require the inclusion of a specific, detailed construction schedule in the Project Description. Potential impacts associated with construction are analyzed based on reasonable assumptions of construction duration and intensity. They are not analyzed on an exact day-by-day or phase-specific construction schedule. Therefore such a schedule is unnecessary in a Project Description. Courts have upheld that CEQA does not demand “excessive detail” that would hamper flexibility or unnecessarily burden the environmental review process. For example, *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1984) 151 Cal.App.3d 61 emphasized that CEQA does not require details that are impractical or speculative at the planning stage. Given the lack of specification on the scope of construction, as evidenced by variable factors, it would be too speculative to assume a definitive construction timeline during the public review phase of the proposed project. Furthermore, as stated in the Project Description of the IS/MND, the proposed project does not include retail sales or access for the general public. Individual clients could visit the site on occasion, any number of client trips would be nominal at best, and would therefore not impact the conclusions of the IS/MND. No additional response is required.

Response to NSRRD2-6

This comment reiterates the claims of Comment NSRRD2-5 on the supposed inadequacy of the Project Description in failing to provide information on the proposed project’s construction timeline in addition to construction activities, equipment, and construction/start dates. The comment claims that this would impact the conclusions of the IS/MND regarding air quality, public health, greenhouse gas (GHG) emissions, and biological resources. Comment noted. See Response to NSRRD2-5. As previously noted, any proposed timeline for construction activity for the proposed project would be conceptual in nature, given the uncertainty due to funding, environmental conditions, and other factors. This would include when providing information on activities and equipment, which would be contingent on site-specific needs at the time of project implementation. Furthermore, the comment fails to cite the project-specific findings

of the IS/MND that would be impacted by the lack of provision of this information, vaguely referring to potential impacts whose conclusions would be altered as a result of this information. As such, the claims of the comment are unsubstantiated given the lack of references to the findings of the environmental analysis, and are therefore speculative at best. No additional response is required.

Response to NSRRD2-7

The commenter discusses how the lack of knowledge about the timing and location of construction may result in impacts to biological resources such as migratory birds if ground-disturbing activities commence during the nesting season (February 1 to August 31).

Comment noted. Implementation of MM BIO-3, MM BIO-4, and MM BIO-6 would eliminate the potential for impacts to nesting birds including Swainson's hawk and burrowing owl. MM BIO-3 stipulates that if any ground-disturbing activities are to occur during the nesting season from February 1 to August 31, that pre-construction surveys for nesting birds will be performed following protocols approved by CDFW for detecting the presence or absence of these species. Pre-construction surveys shall occur no more than 14 days prior to the initiation of work and shall be conducted both on the project site and in a sufficient area surrounding the project site to identify any nests that could potentially be directly or indirectly affected by construction-related activities. If active nests are found within the project area or close enough that nesting success may be affected, a work exclusion zone shall be established around each nest and remain in place until all young in the nest have fledged or the nest becomes inactive. The size of the exclusion zone shall be determined through consultation with CDFW and will be species-specific, ranging from as small as 25 feet for common species disturbance tolerant, to 250 feet or more for raptors.

In addition, MM BIO-4 stipulates that if any project activities are to commence during the nesting season for Swainson's hawk (March 1 to September 15), that surveys shall be performed for Swainson's hawk according to protocols specified in the CDFW publication *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (2000)*. If active Swainson's hawk nests are detected, a 0.5-mile construction avoidance buffer shall be observed around the nest until the nest is no longer active.

Finally, MM BIO-6 stipulates that surveys for burrowing owl shall be performed that follow the protocols specified in the CDFW publication *Staff Report on Burrowing Owl Mitigation (2012)* if any project activities are to commence during the burrowing owl wintering season (September 1 to January 31). Protocol-level surveys shall include a habitat assessment that includes both the project site and within 500 meters of the project site and shall be performed each year work is conducted to account for any changes in habitat conditions such as the creation of small mammal burrows. Surveys for nonbreeding burrowing owls during the wintering season shall also be performed on at least four occasions, including within 24 hours prior to ground disturbance. In the event any burrowing owls are found during any of these surveys, construction activities shall be scheduled to avoid nesting and breeding periods in consultation with CDFW. Language to MM BIO-6 has also been added to include changes recommended by CDFW, as described in Response to CDFW-4 and Response to CDFW-7. No additional response is required.

Response to NSRRD2-8

This comment claims that the Vehicle Miles Traveled (VMT) Analysis prepared for the proposed project is deficient due to the lack of detail on visitor trips. In assessing this, the commenter references the conclusions of a local transportation expert.

This comment is noted. As previously mentioned in Response to NSRRD2-5, the proposed project would not generate a high number of visitor trips because the proposed project would not be open to the public. As such, the nominal amount of client trips would not impact the conclusions of the IS/MND regarding transportation impacts. No additional response is required.

Response to NSRRD2-9

This comment states that since the project site is within the Napa Sanitation District (NapaSan) recycled water service area, the installation of new facilities is required, and that this should be disclosed within the Project Description to analyze the significance of environmental impacts, specifically those related to air quality, noise, biological resources, transportation, and energy. The comment concludes by stating that the proposed project should address these impacts with an EIR.

This comment is noted. Although the project site is within NapaSan's recycled water service area, this does not preclude the expansion or construction of new facilities constituting an environmental impact under CEQA, as noted on page 30 of Section XIX. Utilities and Service Systems of the IS/MND. As noted within the section, the proposed project would not result in the relocation or construction of water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities beyond connections to existing facilities, and the construction of new facilities is not directly referenced in the comment letter. Furthermore, potential environmental impacts resulting from connections to existing facilities, comprising a portion of overall anticipated construction and use during operations, are fully evaluated in the IS/MND across all sections, including those for air quality, noise, biological resources, transportation, and energy. Furthermore, as noted on page 31 of Section XIX. Utilities and Service Systems of the IS/MND, NapaSan, has provided a Will Serve letter for the proposed project. Therefore, the construction of connections to existing facilities, and the potential for unanticipated or significant environmental impacts, would not occur as a result of the proposed project. No additional response is required.

Response to NSRRD2-10

The commenter describes the requirement of CEQA to document baseline environmental conditions on the project site and the rationale for including detailed descriptions of existing environmental conditions.

This comment is noted. CEQA directs commenters on a negative declaration to state the basis for their comments and submit supporting data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts. CEQA Guidelines Section 15204(c). This comment does not provide any specific information regarding the proposed project. No additional response is required.

Response to NSRRD2-11

The commenter describes how the Biological Resources Assessment prepared by FCS dated February 21, 2024, relies on a CNDDB analysis as well as a wildlife and botanical survey performed on December

8, 2022. The commenter also notes that the FCS report describes the site as having been impacted by disking and lack of vegetation. The comment does not identify any specific issues with the IS/MND.

In addition to the reconnaissance survey performed on December 8, 2022, FCS performed 10 focused surveys for avian species as described in the Special-Status Avian Survey Report prepared by Pinecrest dated January 29, 2024, as well as five special-status plant surveys as described in the memorandum prepared by Pinecrest titled Results of Special-Status Plant Surveys at E&P Technology Way dated July 21, 2023. The number of avian surveys performed exceeds the minimum number of surveys required for Swainson's hawk described in the CDFW publication titled Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (2000). The number of plant surveys also exceeds the minimum number of surveys required for assessing the presence of special-status plants as described in the CDFW publication titled Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (2018).

A total of 54 species of birds were observed in the Sheehy Creek riparian corridor, and 18 species of birds were observed in the project area, with the project area defined as the grassland portion of the three parcels excluding the Sheehy Creek riparian corridor and pedestrian pathway. A total of 58 unique species of bird were observed between the project area and the Sheehy Creek riparian corridor. No species of bird were observed nesting in the project area, and two species of bird—Anna's hummingbird and red-shouldered blackbird—were observed nesting in the Sheehy Creek riparian corridor. A total of 45 non-native plant species and nine native plant species were observed in the project area for a total of 54 unique species of plants. None of the native plants observed in the project area were considered special-status plants.

Additionally, the Biological Resources Assessment prepared by FCS does not claim that there is a "lack of vegetation" in the project area, but rather that the vegetation has been impacted by the history of disking leading to domination by non-native plant species and precluding the formation of fossorial mammal burrows.

Response to NSRRD2-12

The commenter summarizes the steps required for characterization of the environmental setting, and cites the letter prepared by Dr. Shawn Smallwood dated November 15, 2024 in arguing that the December 8, 2022 reconnaissance survey was performed for an unknown duration, that the CDFW protocols for surveying for special-status plants were not implemented, and that no surveys were performed for bats and reptiles.

As described in Response to NSRRD2-11, above, the December 8, 2022 reconnaissance survey was followed by 10 focused avian surveys that followed duration and timing protocols specified in the CDFW publication *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (2000)*. Five focused special-status plant surveys were also performed in 2023 that followed protocols as described in the CDFW publication *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (2018)*. The number of avian and plant surveys performed exceeds the minimum number of recommended surveys described in both CDFW protocol publications.

Focused surveys for bats were not performed because the Biological Resources Assessment prepared by FCS concluded that there was no habitat for roosting bats in the project area due to the lack of trees or structures suitable for roosting. Because of the lack of bat roosting habitat in the project area, no impacts to bats are expected to occur and no focused surveys for bats were recommended.

The Biological Resources Assessment did conclude that there was the potential for reptiles, specifically western pond turtle, to exist in the project area and does recommend several mitigation measures to avoid impacts to reptiles and amphibians including western pond turtle. Specifically, MM BIO-8 requires the applicant to perform pre-construction surveys for reptiles and amphibians including western pond turtle, California tiger salamander, foothill yellow-legged frog, and California red-legged frog within 48 hours of ground-disturbing activities. MM BIO-8 also requires the applicant to install exclusion fencing along the entire length of Sheehy Creek to prevent native reptiles and amphibians from entering the project area and requires the applicant to cease all construction activities and notify CDFW and/or the United States Fish and Wildlife Service (USFWS) if special-status reptile or amphibian species are observed on-site. An education program on the identification of special-status reptile and amphibian species is also to be administered to all personnel who will be present at the site during ground disturbance and related activities. No additional response is required.

Response to NSRRD2-13

The commenter summarizes Dr. Smallwood's letter claiming that CNDDDB was consulted to identify documented occurrences of special-status species on or near the project site but did not consult the eBird or iNaturalist databases. The commenter cites Dr. Smallwood's letter stating that four species identified in the IS/MND as having low or no potential for occurrence were documented in the project site.

Comment noted. The likelihood of occurrence presented in the IS/MND is based on the suitability of the habitat in the project area primarily for nesting and secondarily for foraging. The four species presumably alluded to based on examination of Table 4 in Dr. Smallwood's letter are sharp-shinned hawk, Cooper's hawk, Swainson's hawk, and American kestrel. None of these species have any likelihood of nesting in the project area due to the lack of trees or shrubs.

As described in the Biological Resources Assessment prepared by FCS, there is foraging habitat for these and other raptor species in the project area. In order to compensate for the loss of foraging habitat, the applicant, in consultation with CDFW and the County of Napa, proposed MM BIO-5 that requires the applicant to mitigate for the loss of foraging habitat for Swainson's hawk and other raptors at a 1:1 ratio by purchasing foraging credits at a CDFW-approved Swainson's hawk mitigation bank, or by permanently preserving Swainson's hawk foraging habitat through a conservation easement and funding a long-term management plan in perpetuity. Through the implementation of this mitigation, impacts to foraging habitat for raptors would be reduced to less than significant.

Determination of species with the potential to exist in the vicinity of the site was based on an industry standard "nine-quadrangle" search around the project site using the CNDDDB database. Neither eBird or iNaturalist were used since they are not reliable sources of information on determining the presence or absence of species at a given location. eBird and iNaturalist are not based on expert opinion. Rather, they allow any citizen to upload occurrences and therefore occurrences are not regularly checked for accuracy. These databases are known to frequently misidentify species, particularly species that are

frequently confused, such as hawks and raptors. However, CNDDDB's comprehensive and curated data is maintained by CDFW and contains vetted and updated records which caters to special-status species. CNDDDB is also widely used in CEQA compliance and is the standardized method of identifying the likelihood of species occurrences. As Dr. Smallwood did not reference CNDDDB in his discussion of the likelihood of species presence on-site and relied solely on eBird and iNaturalist, his conclusions cannot be confirmed as accurate. No additional response is required.

Response to NSRRD2-14

The commenter paraphrases Dr. Smallwood's letter and states that around 125 special-status species occur in the vicinity of the project site and eight special-status species were recorded on or adjacent to the project site. The commenter additionally states that only 13 vertebrate taxa were documented on the project site by FCS. The commenter reports that Dr. Smallwood found 69 species of vertebrates in three locations within 700 meters of the project site, and 44 species of vertebrates at three additional locations south/southeast of the project site.

Comment noted. The FCS Biological Resources Assessment describes and analyzes the likelihood of the occurrence of 259 special-status species (94 species of animals and 165 species of plants and bryophytes) known within the vicinity of the project site, based on a CNDDDB industry standard "nine-quadrangle" search around the project site.

Additionally, the 125 special-status species Dr. Smallwood identified occurring in the vicinity of the project site include occurrences primarily pulled from eBird and iNaturalist. As described in Response to NSRRD2-13, eBird and iNaturalist are community-sourced platforms that may include misidentification or non-verified data and, as such, are not a substitute for resources agency recognized data like CNDDDB. As such, they are not reliable sources of information on determining the presence or absence of species at a given location. Ebird and iNaturalist are not based on expert opinion. Rather, they allow anyone to upload occurrences and therefore occurrences are not regularly checked for accuracy. These databases are known to frequently misidentify species, particularly species that are frequently confused, such as hawks and raptors. CNDDDB's comprehensive and curated data is maintained by CDFW and contains vetted and updated records which caters to special-status species. CNDDDB is also widely used in CEQA compliance and is the standardized method of identifying the likelihood of species occurrences. As Dr. Smallwood did not reference CNDDDB in his discussion of the likelihood of species presence on-site and relied solely on eBird and iNaturalist, his conclusions cannot be confirmed as accurate. Therefore, Dr. Smallwood's list cannot be considered accurate given the databases used to create it. Additionally, as described in Response to NSRRD2-11, above, the Pinecrest Special-Status Avian Survey Report and the FCS Biological Resources Assessment documented a combined total of 61 species of vertebrates, not 13 (58 species of birds, American beaver, Pacific tree frog, and California vole). The 61 species of vertebrates recorded from a single site exceeds the 44 species observed by Dr. Smallwood at three combined sites south/southeast of the project site and is approximately equal to the 69 species observed by Dr. Smallwood at three combined sites within 700 meters of the project site. Additionally, Dr. Smallwood's species counts resulted from summing the number of species observed at each of three different sites whereas the FCS and Pinecrest observations were made at a single site. To be comparable to the single site surveyed in the FCS and Pinecrest reports, the 44 and 69 species reported by Dr. Smallwood across three sites should be reverse extrapolated to a lower number to be comparable to the single site surveyed in the FCS and Pinecrest reports, since the number of species observed will increase as you increase the

number of sites surveyed. Thus, based on Dr. Smallwood's own data, the community of vertebrates at the project site has been adequately characterized by the FCS and Pinecrest reports. No additional response is required.

Response to NSRRD2-15

The commenter claims that the reports prepared for the project do not accurately describe the baseline environmental setting for biological resources. The commenter also paraphrases Dr. Smallwood's letter stating that multiple special-status species are "not disclosed or analyzed" in the IS/MND.

Comment noted. As described in Response to NSRRD2-14 above, 61 species of vertebrates were observed on-site in the FCS and Pinecrest reports, exceeding or approximately equaling the number of species observed by Dr. Smallwood and other consulting companies at similar sites. As described in Response to NSRRD 2-11, above, a total of 54 unique species of plants were observed in the project area, excluding the Sheehy Creek riparian area, during surveys performed according to CDFW protocols. In addition, the number of surveys performed for birds and plants exceeds the number of surveys required by CDFW protocols. Thus, the baseline biological resources of the site have been adequately described based on Dr. Smallwood's own data and based on adherence to industry standard sampling protocols published by CDFW.

As described in Response to NSRRD 2-14, above, a total of 259 special-status species were analyzed from the vicinity of the project site using an industry standard "nine-quadrangle" search of the CNDDDB database. No species occurrences that appeared during this search were omitted. As described in Response to NSRRD 2-13, above, the likelihood of occurrence for each avian species was determined primarily based on nesting and secondarily based on foraging, thus the low likelihood of occurrence listed for several raptor species in the project area is substantiated since there is no nesting habitat but some foraging habitat that ranges in quality from low to very low depending on the foraging preferences of the species. Low forage quality is primarily due to the history of disking on-site that precludes the formation of small mammal burrows. The comment does not provide substantial evidence that the proposed project would have a significant impact on the environment; therefore, the demand to prepare and EIR is unsupported. The IS/MND properly considers potential impacts. No additional response is required.

Response to NSRRD2-16

This comment reiterates the claims of Comment NSRRD2-4, citing the "fair argument" standard on the need for an EIR for the proposed project due to a lack of substantial evidence disproving the proposed project's potential to result in significant environmental impacts.

As described in Response to NSRRD2-5 through NSRRD2-15, the commenter's claims that the proposed project would result in significant impacts are unsubstantiated. Additionally, the commenter does not provide any substantial evidence or examples to suggest that the County failed to address a subject or disclose information regarding the proposed project's environmental impact. As such, the comment is speculative, given the lack of reference to the findings of the environmental analysis prepared for the IS/MND. No additional response is required.

Response to NSRRD2-17

The comment claims that the IS/MND lacks evidence suggesting that the project emissions would be less than significant during construction and operations. The comment provides attachments of California Emissions Estimator Model (CalEEMod) calculations supposedly showing emissions results for the proposed project and suggesting that implementation of mitigation measures requiring use of products with limited volatile organic compound (VOC) concentrate would reduce impacts to less than significant.

The CalEEMod results included in the comment letter misinterpreted Bay Area Air Quality Management District (Bay Area Air District) thresholds. The commenter erroneously compared the modeling's summer maximum emissions to the Bay Area Air District thresholds that are based on average daily emissions as opposed to summer maximum emissions. Utilizing the commenter's modeling results for illustrative purpose only, when comparing the appropriate CalEEMod emissions (i.e., average daily emissions) to Bay Area Air District thresholds, all emissions are below the established thresholds. The proposed project would not result in significant air quality impacts. No additional response is required.

Response to NSRRD2-18

The comment states that the project's reliance on Bay Area Air District design standards, California Building Standards Code (CBC) requirements, and the County's conditions of approval lack substantial evidence supporting the conclusion that the proposed project would not result in less than significant GHG emission impacts. The comment quotes Section VIII Greenhouse Gas Emissions of the IS/MND summarizing GHG emission reduction strategies of the proposed project.

Comment noted. This comment provides an overview of the GHG emission reduction strategies of the proposed project but fails to fully explain how incorporation of the aforementioned strategies fails the CEQA fair argument standard for proving that the proposed project would result in significant environmental impacts. Given the vagueness of the comment and the lack of substantial evidence disproving the findings of the IS/MND, this comment does not meet the fair argument test required by CEQA. No additional response is required.

Response to NSRRD2-19

This comment asserts that lack of implementation of certain GHG emission reduction strategies, would preclude the proposed project from reducing GHG emission impacts to a less than significant level. The comment references an uncited statement in the Staff Report, claiming that lack of incorporation of these strategies would entail preparation of an EIR.

Comment noted. As discussed in greater detail in Response to NSRRD2-33 below, per CEQA Guidelines Section 15070(b), the proposed project is not required to reduce project-specific impacts to the maximum extent possible, but to a level that is less than significant. Although the comment references a statement supposedly referencing the possibility of incorporating additional GHG emissions reduction strategies, an overview of potential measures to be incorporated into the proposed project does not preclude the findings in that not all reduction strategies would need to be implemented to reduce GHG emissions impacts to a level that is less than significant, as required by CEQA. Without an explanation as to why implementation of the select GHG emissions reduction strategies would not reduce GHG emissions impacts to a level that is less than significant, the claims purported by this comment are unsupported assumptions and do not provide facts or substantial evidence of significant impacts. Pursuant to CEQA

Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence. As demonstrated in Section VIII, Greenhouse Gas Emissions, of the IS/MND, the proposed project would have a less than significant GHG emissions impact and would not require mitigation. No additional response is required.

Response to NSRRD2-20

The commenter states that loss of grassland would result in potentially significant impacts due to habitat loss. The commenter quotes Dr. Smallwood's letter stating that loss of habitat results in "66% loss of species on the site and a 48% loss of species in the project area."

Comment noted. These statements are vague and do not provide substantial evidence of potential significant impacts. Moreover, impacts must be analyzed for each species individually. For raptors, including Swainson's hawk, no nesting habitat exists on-site. However, there is some foraging habitat on-site. As described in MM BIO-5 and in the Response to NSRRD 2-13 above, loss of foraging habitat will be mitigated at a 1:1 ratio either at a CDFW-approved mitigation bank or through preservation of off-site habitat in perpetuity. Additionally, as described in Response to NSRRD 2-7 above, implementation of MM BIO-3, BIO-4, and BIO-6 would reduce impacts to migratory birds and burrowing owl to less than significant. As described in Response to NSRRD 2-12 above, MM BIO-8 is designed to reduce impacts to reptiles and amphibians to less than significant. CDFW reviewed each of these MMs from the IS/MND and did not have any further comments nor did CDFW object to the conclusions in the IS/MND. No additional response is required.

Response to NSRRD2-21

The commenter quotes Dr. Smallwood's letter that habitat loss results in the loss of "productive capacity" and that the project may result in the loss of "over 1,000 birds" annually.

Comment noted. As discussed in greater detail in Response to NSRRD 2-72 below, it is unclear through what mechanism over 1,000 birds would be lost annually because of implementation of the proposed project. It is also unclear what is meant by "productive capacity" as it relates to wildlife reproduction as this is not a term used in peer-reviewed academic literature. Without definition of these terms or any explanation of the causal factors of mortality, these calculations are unsupported assumptions and do not provide facts or substantial evidence of significant impacts. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence. No additional response is required.

Response to NSRRD2-22

The commenter states that project-generated traffic may significantly impact biological resources such as California red-legged frog, California tiger salamander, and American badger.

Comment noted. CDFW reviewed the IS/MND and did not have any comments regarding traffic-related impacts to special-status species. See Response to NSRRD 2-78 below, for further discussion of traffic-related mortality. No additional response is required.

Response to NSRRD2-23

The commenter states that Dr. Smallwood's letter recommends silt fencing be installed 300 feet from the southern top of bank of Sheehy Creek to lessen impacts to wildlife in the riparian corridor.

Comment noted. CDFW reviewed the IS/MND and did not have any comments regarding the placement of silt fencing along the edge of the riparian corridor. Additionally, MM BIO-1 and MM BIO-8 require the installation of a silt fence along with exclusion fencings around Sheehy Creek's riparian corridor to prevent native amphibian species from entering the project site from Sheehy Creek. This minimizes the potential for amphibian mortality via dispersal, while lowering human disturbances within the riparian corridor via construction activities. Placement of silt fencing 300 feet south of the top of bank of Sheehy Creek is not a practical recommendation or standard protocol, since the width of the project area between Sheehy Creek and Technology Way ranges from 350 to 440 feet, leaving only 50-140 feet of buildable space. This is not financially feasible for the proposed project, nor is it necessary because the exclusion fencing would adequately reduce potential impacts to less than significant levels under CEQA. Although the studies referenced by Dr. Smallwood affirm why silt fencing is necessary as amphibian and reptile species have been recorded moving almost 300 feet within adjacent terrestrial habitat, with implementation of the exclusion fencing, movement through the project site during ground disturbance will be negated, reducing impacts to amphibians and reptiles. No additional response is required.

Response to NSRRD2-24

The commenter paraphrases Dr. Smallwood's letter asserting that the CDFW rare plant guidelines are for reconnaissance surveys and not pre-construction surveys.

Comment noted. Rare plant surveys that follow the CDFW (2018) guidelines are typically called "protocol level," whereas "reconnaissance level" surveys are those that are less thorough and preliminary in nature. MM BIO-2 proposes protocol-level surveys to be performed the spring before construction begins, in addition to the five protocol-level surveys that were performed on the project site by Pinecrest in 2023. If protocol-level surveys are performed, these can be considered pre-construction or reconnaissance surveys, as the difference between pre-construction and reconnaissance surveys is largely semantic. No additional response is required.

Response to NSRRD2-25

The commenter paraphrases Dr. Smallwood's letter asserting that implementation of pre-construction surveys for nesting birds and establishment of buffers if nests are identified will not reduce potentially significant impacts from habitat loss.

Comment noted. As described in Response to NSRRD 2-13 above, there is no suitable nesting habitat in the project area except for ground nesting bird species, and pre-construction nest surveys will be performed to ensure that no nests are impacted. Loss of foraging habitat would also be mitigated off-site at a 1:1 ratio. CDFW reviewed the mitigation measures in the IS/MND and did not have any further comments regarding the adequacy of nesting bird surveys or the implementation of buffers. Nor did CDFW comment on the impact conclusions. No additional response is required.

Response to NSRRD2-26

The commenter paraphrases Dr. Smallwood's letter asserting that burrowing owl require detection surveys during both nonbreeding and breeding periods as well as pre-construction take avoidance surveys.

Comment noted. Proposed surveys for MM BIO-6 include pre-construction surveys as well as surveys that follow the protocols in the CDFW publication *Staff Report on Burrowing Owl Mitigation (2012)*. Specifically, protocol-level surveys shall include a habitat assessment that includes both the project site and within 500 meters of the project site and shall be performed each year work is conducted to account for any changes in habitat conditions such as the creation of small mammal burrows. Surveys for nonbreeding burrowing owls during the wintering season shall also be performed on at least four occasions, including within 24 hours prior to ground disturbance. In the event any burrowing owls are found during any of these surveys, construction activities shall be scheduled to avoid nesting and breeding periods in consultation with CDFW. Additionally, MM BIO-6 in Section IV, Biological Resources, of the IS/MND has been revised to include additional language recommended by CDFW which stipulates that the proposed project would obtain a CESA ITP if take of burrowing owl cannot be avoided. No additional response is required.

Response to NSRRD2-27

The commenter paraphrases Dr. Smallwood's letter asserting that one-way passages should be installed in silt fencing and that "highly significant impacts to amphibians" would occur as a result of installation of the fencing.

Comment noted. One-way passages are feasible to install in the silt fencing, and if combined with regular visual inspection of the fence by the project Biologist, will ensure that no amphibians or reptiles are trapped on the project side of the fence. The assertion that fencing would create highly significant impacts to amphibians is not supported by data, and the assumption that fencing would create impacts is not supported by any provided facts. No additional response is required.

Response to NSRRD2-28

The commenter states that the proposed project's impacts on biological resources may be significant and unmitigated and that an EIR must be prepared to evaluate potential impacts.

Comment noted. As described in Response to NSRRD2-7 and Response to NSRRD2-12 above, environmental baseline data has been adequately documented, and surveys and mitigation measures for plants and wildlife follow accepted protocols and have been approved by CDFW through their review of the IS/MND.

The CEQA Guidelines directs commenters to focus on the proposed finding in an IS/MND that the project will not have a significant environmental effect (CEQA Guidelines § 15204(a)). In accordance with Section 15204(b), commenters who believe that a project will have a significant environmental effect should identify the specific significant effect, explain why the specific effect would occur, and explain why the effect would be significant.

Commenters should also submit supporting data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts to support their assertions (CEQA Guidelines § 15204(c)). Here, the comments fail to identify specific significant effects and do not provide any specific facts to support the general statements that the project “may be significant and unmitigated.”

No additional response is required.

Response to NSRRD2-29

The commenter, Daniel T. Smith, Jr. of Smith Engineering & Management, states in a letter dated November 12, 2024, that the VMT impacts were improperly evaluated by separately analyzing Buildings A and B. The commenter also raises an issue relative to the trip generation and need to treat the office space separately as opposed to being ancillary to the warehouse function.

Comment noted. The projects are on separate parcels and are intended to be owned and managed separately; a single traffic study was prepared as both projects are proceeding at the same time. Although the projects were analyzed separately, the IS/MND properly analyzes the whole of the project because the combined traffic impacts were considered via the cumulative impacts discussion within the IS/MND. However, under the County’s VMT policy, projects that do not screen out are required to reduce their VMT by 15 percent to mitigate their potential impact. The recommendation to prepare a Transportation Demand Management (TDM) Plan can be applied to both buildings rather than to Building B, if the County deems it necessary. With implementation of trip reduction measures by 15 percent, the impacts for both buildings would be less than significant.

It is noted that for Building B the office space is indicated as 11,000 square feet out of a total of 66,915 square feet, or approximately 16 percent of the total floor area. The description provided in the *Trip Generation Manual*, 11th Edition, for “Warehouse” (Land Use 150) says, “A warehouse is primarily devoted to the storage of materials, but it may also include office and maintenance areas.” As almost 84 percent of the building would be dedicated to warehouse uses, it is reasonable to conclude that this is the primary use, making the application of this rate to the entire space consistent with the land use designation.

As a point of comparison, it is noted that application of trip generation rates for an office use versus a warehouse use for the 11,000 square feet of that use proposed in Building B would increase the trip generation by 10 trips during the AM peak-hour and one during the PM peak-hour, with 67 more trips on a daily basis. However, as the building was already anticipated to generate more than 110 daily trips, so has a recommended measure to mitigate potential VMT impacts, the change in the trip generation would have no effect on the findings or conclusions of the analysis. Similarly, the limited number of additional peak-hour trips would reasonably be expected not to result in any new adverse effects, though it is noted that this issue is not related to CEQA, so would have no effect on the Initial Study.

Based on the details provided above, the potentially significant transportation impacts of the project have already been identified and mitigations identified; hence an EIR is not warranted with respect to further evaluating potential transportation impacts. No additional response is required.

Response to NSRRD2-30

The comment states that the IS/MND fails to analyze the impacts resulting from the conversion of farmland to nonagricultural use, citing the proposed project's findings on the continued buildout of area surrounding the project site and the project site's classification under Farmlands of Local Importance.

As mentioned within the quote cited by the comment, the proposed project would not result in the conversion of existing farmland; as noted in Section II Agriculture and Forestry Resources in the IS/MND, the site is undeveloped and has been designated for industrial/business park uses for the last 35 years. As such, development of the proposed project would not result in the conversion of farmland to nonagricultural uses, given the broad definition of the site's classification under Farmlands of Local Importance, which includes all undeveloped lands with soils which "meet the characteristics of Prime Farmland or of additional Farmland of Statewide Importance except for irrigation." As noted in the same Section, this parallels the development of surrounding parcels in the Napa Valley Business Park Specific Plan (NVBPSP) area, which have been reclassified as Urban and Built-Up Land, thus negating the potential for future agricultural uses within the site and the surrounding area. As such, there is no evidence that the proposed project would result in significant environmental impacts due to the conversion of farmland to nonagricultural uses. No additional response is required.

Response to NSRRD2-31

This concluding comment reiterates the claim that the proposed project is inadequate under CEQA and requires provision of an EIR to account for potential significant impacts. The comment does not contain any specifics or details to support the statements.

Comment noted. See Response to NSRRD2-4 through Response to NSRRD2-30. No additional response is required.

Response to NSRRD2-32

This comment describes the project proponent, objectives, proposed uses, parking area, circulation plan, utilities, and location, including parcel numbers and approximate dimensions of proposed buildings of the proposed project. The comment concludes by stating that the IS/MND fails to provide sufficient information justifying the environmental impacts would be less than significant, specifically air quality impacts through the lack of provision of an air quality analysis performed through CalEEMod.

As explained in Section III, Air Quality, of the IS/MND, the project falls well below the Bay Area Air District screening criteria, and consequently will not significantly affect air quality individually or contribute considerably to any cumulative air quality impacts. Since all screening criteria for criteria air pollutants and precursors are met by the proposed project, a detailed assessment of the project's criteria air pollutant and precursor emissions is not required since the emissions from the proposed project would be under the Bay Area Air District quantitative thresholds of emissions for these pollutants.

No additional response is required.

Response to NSRRD2-33

This comment states that assertions regarding GHG emissions impacts for Buildings A and B are significant and unmitigated. The comment references the lack of incorporation of certain GHG emissions

reduction strategies, which the comment asserts would cause the proposed project to result in significant GHG emissions impacts. To supplement this response, the commenter provides a conceptualized quantitative analysis of the proposed project's GHG emissions during construction and operation using CalEEMod.

Although the commenter asserts that incorporation of additional GHG emissions reduction measures would result in lower GHG emissions, per CEQA Guidelines Section 15070(b), the proposed project would not be required to reduce project-specific impacts to the maximum extent possible, but to a level that is less than significant. Although the comment references a statement within the IS/MND supposedly referencing the possibility of incorporating additional GHG emissions reduction measures, incorporation of these measures is speculative and would be conducted on a project-specific basis to result in reducing GHG emissions impacts to a level that is less than significant. The commenter does not demonstrate how the proposed project would conflict with any local or regional air quality screening thresholds of significance when assessing whether GHG emissions impacts resulting from the proposed project would be less than significant, wherein the Lead Agency is permitted to select these thresholds based on "substantial evidence" per CEQA Guidelines Section 15064(c). As such, the commenter does not raise substantial evidence that the proposed project would result in significant GHG emissions impacts under CEQA Guidelines. No additional response is required.

Response to NSRRD2-34

The comment claims that without mitigation, emissions resulting from reactive organic compounds (ROCs) would exceed Bay Area Air District thresholds.

As previously mentioned in Response to NSRRD2-32 through Response to NSRRD2-33, the proposed project would not exceed established Bay Area Air District thresholds, which establishes an emission threshold for average daily emissions. The commenter erroneously compared the modeling's summer maximum emissions to the Bay Area Air District's thresholds which are based on average daily emissions. When correctly comparing the modeling's average daily emissions to the Bay Area Air District thresholds, all emissions are below thresholds. Therefore, utilizing the commenter's own modeling results for illustrative purposes, the proposed project still would not result in a significant air quality impact.

No additional response is required.

Response to NSRRD2-35

The comment provides concluding remarks that the proposed project would result in significant environmental impacts and would require an EIR.

Comment noted. Refer to Response to NSRRD2-31 through Response to NSRRD2-35. No additional response is required.

Response to NSRRD2-36

The commenter describes the location of the proposed project, the dimensions of the proposed buildings, and that the purpose of writing the letter is to comment on impacts to biological resources in the IS/MND prepared by FCS and the County. This comment is noted. No additional response is required.

Response to NSRRD2-37

The commenter describes their qualifications. This comment is noted. No additional response is required.

Response to NSRRD2-38

The commenter describes the process of characterizing existing environmental conditions through field surveys and reviews of literature and available databases. This comment is noted. No additional response is required.

Response to NSRRD2-39

The commenter describes the purpose of CEQA and the requirement to know biological species that exist on-site and which species are likely to occur; however, this comment does not raise any issues specific to the proposed project or the IS/MND. This comment is noted. No additional response is required.

Response to NSRRD2-40

The commenter states that the survey performed on December 8, 2022 was reconnaissance level and therefore not appropriate for use as baseline data for an IS/MND.

Comment noted. As described in Response to NSRRD2-11 above, the December 8, 2022 survey was followed by 10 protocol-level avian surveys and five protocol-level plant surveys. No additional response is required.

Response to NSRRD2-41

The commenter states that without knowing how long the December 8 survey lasted the survey results cannot be fully interpreted.

Comment noted. As described in Response to NSRRD2-11 above, the December 8 survey was followed by 10 protocol-level avian surveys and five protocol-level plant surveys. Duration and timing of each survey was performed according to CDFW protocols. Duration of avian surveys were at least 4 hours and were initiated typically between 7:30 a.m. and 8:30 a.m. as described in the Special-Status Avian Survey Report prepared by Pinecrest dated January 29, 2024. No additional response is required.

Response to NSRRD2-42

The commenter states that starting surveys at 11:00 a.m. results in fewer species observed than early morning surveys.

Comment noted. As described in Response to NSRRD2-41 above, avian surveys were initiated typically between 7:30 a.m. and 8:30 a.m. as described in the Special-Status Avian Survey Report prepared by Pinecrest dated January 29, 2024. No additional response is required.

Response to NSRRD2-43

The commenter argues that FCS detected 13 taxa of vertebrate wildlife within the project site and stated that he detected 69 species of vertebrate wildlife at three separate locations within 700 meters of the site. The commenter concludes that the reconnaissance surveys conducted by FCS were “grossly deficient, and its results ill-suited for characterizing the existing environmental settings.”

Comment noted. As described in Response to NSRRD2-14, above, the Pinecrest Special-Status Avian Survey Report and the FCS Biological Resources Assessment report a combined total of 61 vertebrate species, not 13. This number from a single site exceeds the 44 species observed by the commenter at three combined sites south/southeast of the project site and is approximately equal to the 69 species observed by the commenter at three combined sites within 700 meters of the project site. Additionally, the commenter's species counts result from summing the number of species observed at each of three different sites, which is not an industry accepted practice for conducting species counts. To be comparable to the single site surveyed in the FCS and Pinecrest reports, the 44 and 69 species observed by Dr. Smallwood across three sites should be reverse extrapolated to a lower number to be comparable to the single site surveyed in the FCS and Pinecrest reports, since the number of species observed will increase as you increase the number of sites surveyed. Thus, based on Dr. Smallwood's own data, the community of vertebrates at the project site has been adequately characterized by the FCS and Pinecrest reports. No additional response is required.

Response to NSRRD2-44

The commenter states that FCS did not follow the CDFW 2018 plant survey guidelines.

Comment noted. As described in Response to NSRRD2-11 above, five special-status plant surveys were conducted according to protocols described in the CDFW publication titled *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (2018)*, exceeding the number of surveys required. The results of these surveys are described in the memorandum prepared by Pinecrest titled Results of Special-Status Plant Surveys at E&P Technology Way dated July 21, 2023. A total of 54 species of plants were observed in the project area, defined as the grassland portion of the three parcels excluding the Sheehy Creek riparian corridor and pedestrian pathway. No additional response is required.

Response to NSRRD2-45

The commenter states that no surveys were performed for bats, small mammals, or reptiles.

Comment noted. See Response to NSRRD2-12, above, regarding bat, reptile, and amphibian surveys. Live trapping for small mammals is not warranted since there are no known special-status species of small mammals that have the potential to exist on the project site. No additional response is required.

Response to NSRRD2-46

The commenter reports there is a discrepancy in the FCS (2024) report in that the riparian corridor is stated as having high quality habitat whereas the project area does not contain habitat for special-status species due to the history of disking.

Comment noted. This is correct, the Sheehy Creek riparian corridor is in a conservation easement, and is not defined as part of the project area. The project area is defined as the ruderal grassland portion of the parcels, exclusive of the riparian corridor and pedestrian walkway. The project area has been disked and mowed annually for many years and is not high-quality natural habitat particularly when compared to the conservation easement. The value of the upland grassland habitat is reduced due to the history of disking, since disking eliminates fossorial mammal burrows and soil cracks that might otherwise provide

refugia for animals migrating out of the riparian corridor. There is no discrepancy or inconsistency in the IS/MND. No additional response is required.

Response to NSRRD2-47

The commenter describes the purpose of literature and database reviews. This comment is noted. No additional response is required.

Response to NSRRD2-48

The commenter indicates that the FCS report did not consult eBird or iNaturalist when compiling a list of species that are known to occur on or near the project site.

As described in Response to NSRRD2-13, above, species with potential to exist in the vicinity of the site were compiled based on an industry standard "nine-quadrangle" search around the project site using the CNDDDB database. Neither eBird or iNaturalist were used since they are not reliable sources of information on the presence or absence of species at a given location, nor are they consistent with industry practice. Whereas the CNDDDB database is curated, eBird and iNaturalist are community-sourced platforms that allow lay individuals to upload occurrences. The data is not vetted by experts and occurrences are not regularly checked for accuracy. These databases are known to frequently misidentify species that are frequently confused, such as hawks and raptors. However, CNDDDB's comprehensive and curated data is maintained by CDFW and contains vetted and updated records that cater to special-status species. CNDDDB is also widely used in CEQA compliance and is the standardized method of identifying the likelihood of species occurrences. As Dr. Smallwood did not reference CNDDDB in his discussion of the likelihood of species presence on-site and relied solely on eBird and iNaturalist, his conclusions cannot be confirmed as accurate. No additional response is required.

Response to NSRRD2-49

The commenter states that CNDDDB is not sufficient to characterize the wildlife community of a site and states that FCS "misuses" the CNDDDB database.

Comment noted. As described in Response to NSRRD2-43, above, the wildlife community of the site was extensively characterized with over 10 targeted wildlife surveys identifying a total of 61 vertebrate species, and five protocol-level plant surveys identifying a total of 54 plant species. The number of animal species identified on-site meets or exceeds the commenter's own species counts from nearby locations.

The CNDDDB database was also used according to its intended purpose. As described in Response to NSRRD2-48 above, an industry standard "nine-quadrangle" search was performed around the project site using the CNDDDB database in order to generate a minimum list of species that may occur on-site, not to rule out species that may exist on-site. Subsequent field surveys were performed to identify any special-status species on-site, and any special-status species on-site would be identified even if they did not appear on the nine-quadrangle CNDDDB search. No additional response is required.

Response to NSRRD2-50

The commenter describes how the CNDDDB database is compiled and notes general features about the database; however, the comment does not identify any issues specific to the proposed project or the IS/MND.

This comment is noted. No additional response is required.

Response to NSRRD2-51

The commenter states they believe 125 special-status species of wildlife should be analyzed for occurrence, and reports that some of these species have been observed on or in the vicinity of the project site.

The numbers presented by the commenter are in error. Additionally, the comment's assertion that, based on those numbers, the project site supports multiple special-status species of wildlife is unsupported. See *Response to NSRRD2-14* above. No additional response is required.

Response to NSRRD2-52

The commenter claims that FCS analyzed only 51 special-status species for the potential to occur on-site and contends that numerous species are misclassified as having a low likelihood of existing on-site.

The numbers presented by the commenter are in error. As described in *Response to NSRRD2-14* above, the Biological Resources Assessment prepared by FCS analyzes the likelihood of occurrence of a total of 259 special-status species including 94 species of animals. This list was generated using an industry standard "nine-quadrangle" search of the CNDDDB database. No species occurrences that appeared during this search were omitted. As described in *Response to NSRRD2-13* above, the likelihood of occurrence for each avian species was determined primarily based on nesting habitat and secondarily based on foraging habitat, thus the "low" or "very low" likelihood of occurrence listed for several raptor species in the project area is substantiated since there is no nesting habitat in the project area but some foraging habitat that ranges in quality from low to very low due to the history of disking.

Subsequent field surveys were performed to identify any special-status species on-site, and any special-status species on-site would be identified even if they did not appear on the nine-quadrangle CNDDDB search. No additional response is required.

Response to NSRRD2-53

The commenter describes inaccuracies in the legal status of various species in the occurrence likelihood table.

Comment noted. Out of 259 species in the occurrence likelihood table, 17 displayed legal status based on outdated classifications. Despite this, none of the conclusions in the IS/MND are affected or require revision. The occurrence likelihood table does not claim to be an exhaustive listing of all the state and federal protections afforded to each species. Any special-status species observed on-site would be given appropriate protections regardless of the status presented in the occurrence likelihood table. No additional response is required.

Response to NSRRD2-54

The commenter states that no valid reason for determining potential for occurrence is given. The commenter also claims that differences between nesting and foraging habitat are a "contrived bifurcation of habitat that lacks scientific foundation."

Comment noted. The claim by the commenter that the difference between nesting and foraging habitat is a "contrived bifurcation of habitat that lacks scientific foundation" is without merit. It is common knowledge that most birds nest in different habitats than they forage in. Furthermore, birds spend much more time proportionately at their nest site than in any one foraging site. Finally, from a population dynamic perspective, disturbance of nest sites has a much more profound influence on population persistence than an equal area of foraging habitat. These are all broadly accepted scientific principles.

The "likelihood to occur" is an often-used phrase but really contains two distinct components, likelihood of nesting, and likelihood of foraging. As described in Response to NSRRD2-13 above, the likelihood of occurrence for each avian species was determined primarily based on nesting habitat and secondarily based on foraging habitat. For this project site, there is no likelihood of nesting, but some likelihood of foraging for most raptors. To come up with a single "likelihood to occur," FCS weighted the lack of nesting habitat as greater than the presence of foraging habitat. Thus the "low" or "very low" likelihood of occurrence listed for several raptor species in the project area is substantiated since there is no nesting habitat but some foraging habitat that varies in quality from high to low depending on the foraging patterns and preferences of the species. No additional response is required.

Response to NSRRD2-55

The commenter states that American badger may exist on-site due to their personal observation of American badger in a variety of habitats. The commenter takes issue with the claim that American badger prefer habitats with "plenty of prey;" however, the comment does not provide any specific evidence or facts related to the project site.

Comment noted. The likelihood of occurrence for this species was determined based on the probability that this species would den in the project area. The project area is defined as the grassland habitat of the parcels exclusive of the Sheehy Creek riparian corridor and pedestrian pathway. The project area is entirely flat, lacks any woody plant cover or topography, is regularly disked and mowed, and is surrounded on three sides by development. This would be considered by most Biologists as unsuitable habitat for American badger to create dens in.

In terms of foraging, it is an established principle in the scientific literature that large predators including badgers prefer and migrate toward habitats with plenty of prey. The project area is surrounded on three sides by development and has no fossorial mammal or rodent burrows due to the history of disking and mowing, limiting the prey abundance. The project site quantitatively contains less prey than un-disked habitats adjacent to open space, and American badger, like most predators, prefer habitats with plenty of prey. No additional response is required.

Response to NSRRD2-56

The commenter states that bald eagles forage in a variety of habitats and may hunt ground squirrels and other mammals. The commenter says they observed a bald eagle 2.7 miles from the project site and that "2.7 miles from the project site is essentially at the project site."

Comment noted. As discussed in Response to NSRRD2-54 above, the likelihood of occurrence for each avian species was determined primarily based on nesting habitat and secondarily based on foraging habitat. For this project site, there is no likelihood of nesting for bald eagle, and the likelihood of foraging

for this particular species is also close to zero. Moreover, there is a lack of substantial evidence to support a finding of foraging habitat on the project site in the comment. As the commenter mentions, bald eagles will occasionally hunt ground squirrels and other terrestrial animals. However, there are no ground squirrels or other fossorial mammals at this site due to the history of disking and mowing. Bald eagles prefer large prey, and the project site entirely lacks large prey such as rabbits and ground squirrels, making the likelihood of observing a bald eagle foraging this site unlikely. While the commenter may have observed a bald eagle 2.7 miles away, this is not "essentially at the project site." The observation of a bald eagle 2.7 miles away coincides with a known occurrence of bald eagle in the CNDDDB database in the Napa-Sonoma Marsh surrounding the Napa River, a much more likely place to find a bald eagle foraging and a completely different habitat than on the project site. Nonetheless, FCS classified the likelihood of occurrence of this species as "very low" and not "none." No additional response is required.

Response to NSRRD2-57

The commenter states that they saw a peregrine falcon within 2.7 miles of the project site and that the classification of "low" likelihood of occurrence is inaccurate.

Comment noted. As discussed in Response to NSRRD2-54 above, the likelihood of occurrence for each avian species was determined primarily based on nesting habitat and secondarily based on foraging habitat. To come up with a single "likelihood to occur," FCS weighted the lack of nesting habitat as greater than the presence of foraging habitat. For this project site, there is no likelihood of nesting for peregrine falcon, and the likelihood of foraging for this particular species is low. Peregrine falcons primarily hunt other birds in the air, thus a peregrine falcon would tend to occur on-site only if they caught a bird and landed in the field to process the prey. Therefore, the weighted likelihood of occurrence for this species as "very low" is substantiated.

Regardless of the stated likelihood of occurrence, if peregrine falcon were observed nesting near the project parcel, appropriate protections would be afforded this species. The likelihood of occurrence is only a guide and does not exclude species from consideration. No additional response is required.

Response to NSRRD2-58

The commenter disagrees that western pond turtle is listed as having no likelihood of occurrence on-site.

Comment noted. This is a typographical error and is clarified in the sentence in the occurrence likelihood table that immediately follows: "Some marginally suitable nesting habitat exists on-site." In addition, surveys and avoidance measures for western pond turtle are recommended in the conclusions of the Biological Resources Assessment and incorporated into MM BIO-8. The conclusions in the IS/MND accurately reflect the biological findings and do not require any revisions. No additional response is required.

Response to NSRRD2-59

The commenter states that the likelihood determination for burrowing owl is incorrectly classified as "very low" and asserts that no reason is given for this determination other than the disturbed nature of the site. The commenter describes a locality known from 240 meters off-site, and claims that this is "essentially on the project site."

Comment noted. As described in Response to CDFW-4 above, a habitat assessment for burrowing owl following the CDFW (2012) protocols determined that the entirety of the project site is free from structures that could be utilized as burrows including fossorial mammal burrows, pipes, culverts, and debris piles. The entirety of the project site has been disked and mowed regularly, disrupting the formation of ground squirrel or other types of burrows, and is free from debris including pipes or wood piles. This is sufficient to declare the habitat unsuitable for burrowing owl according to the CDFW (2012) protocols. Nonetheless, FCS performed burrowing owl surveys 10 times in 2022 and 2023 that encompassed the entirety of the project site. No burrowing owls were observed on-site, and no burrowing owls have been observed within 15 miles of the project site since the single observation of a wintering individual 0.2 mile off-site to the northeast in 2006. No additional response is required.

Response to NSRRD2-60

The commenter presents the different types of surveys described in the CDFW publication *Staff Report on Burrowing Owl Mitigation (2012)*.

This comment is noted. No additional response is required.

Response to NSRRD2-61

The commenter describes additional detail about the purpose of each kind of burrowing owl survey in the CDFW (2012) protocols.

This comment is noted. No additional response is required.

Response to NSRRD2-62

The commenter describes how the site may be suitable for burrowing owl and how they have seen ground squirrels near the project site, but not on the project site. The commenter states that protocol-level burrowing owl surveys should be performed according to the CDFW (2012) protocols.

Comment noted. As described in Response to CDFW-4, and Response to NSRRD2-59 above, the commenter is incorrect in stating only a single reconnaissance survey was performed. In fact, 10 targeted burrowing owl field surveys were performed on the project site that conform to the protocols specified in the CDFW publication *Staff Report on Burrowing Owl Mitigation (2012)*. No additional response is required.

Response to NSRRD2-63

The commenter states that they believe that the designation of Swainson's hawk likelihood of occurrence as very low is incorrect. The commenter states that Swainson's hawk forage over many types of habitats including disturbed ground and that 0.25 mile is not far for a Swainson's hawk to fly.

Comment noted. As described in Response to NSRRD2-54 above, the likelihood of occurrence for each avian species was determined primarily based on nesting habitat and secondarily based on foraging habitat. To come up with a single "likelihood to occur" FCS weighted the lack of nesting habitat as greater than the presence of foraging habitat. For this project site, there is no likelihood of nesting for Swainson's hawk, and the likelihood of foraging for this particular species is low due to the lack of small mammal prey on-site due to the history of disking and disruption of fossorial mammal burrows. Nonetheless, FCS

conducted 10 focused field surveys for Swainson's hawk in 2022 and 2023 according to the CDFW publication *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (2000).

Regardless of the stated likelihood of occurrence, if Swainson's hawk were observed nesting near the project parcel, appropriate protections would be afforded this species. The likelihood of occurrence is only a guide and does not exclude species from consideration. No additional response is required.

Response to NSRRD2-64

The commenter describes their skepticism of reports documenting the recovery of Swainson's hawk in the region; however, this comment does not raise any issues specific to the project site or the IS/MND.

This comment is noted. No additional response is required.

Response to NSRRD2-65

The commenter criticizes the County's "failure" to implement "appropriate survey and mitigation guidelines" related to Swainson's hawk.

This comment is noted. The IS/MND states that less than 1 percent of Swainson's hawk foraging habitat would be affected by the proposed project and that hundreds of acres of additional foraging habitat is within 5 miles of the project site. However, the proposed project would mitigate for the loss of Swainson's hawk habitat through MM BIO-5 which stipulates that the proposed project shall provide Swainson's hawk foraging habitat mitigation at a minimum 1:1 ratio. Dr. Smallwood does not address why MM BIO-5 would be insufficient to mitigate for the loss of foraging habitat for Swainson's hawk. Therefore, appropriate survey and mitigation guidelines are present within the IS/MND. No additional response is required.

Response to NSRRD2-66

The commenter takes issue with the claim that 0.16 percent of potential foraging habitat of the average home range of a single individual would be lost due to implementation of the proposed project. The commenter states that "[i]f the 0.16% of foraging habitat that is lost is the 0.16% that makes the difference between persistence and extirpation, then the 0.16% would be of critical importance."

Comment noted. The County is aware of the severity of the loss of foraging habitat for the Swainson's hawk and although there is no conclusive way to argue that 0.16 percent of habitat loss would be the difference between persistence and extirpation, the project nonetheless offers up mitigation to account for the loss of Swainson's hawk foraging habitat through the implementation of MM BIO-5. As stated above in Response to NSRRD2-65, the proposed project shall provide Swainson's hawk foraging habitat mitigation at a minimum 1:1 ratio. Therefore, impacts to Swainson's hawk foraging habitat would not be reduced to a less than significant level under CEQA. No additional response is required.

Response to NSRRD2-67

The commenter describes the purpose of an impact analysis and emphasizes the importance of adequate characterization of the environmental setting. The commenter asserts that the environmental setting has not been adequately characterized and that potential impacts have not been analyzed.

Comment noted. As described in Response to NSRRD2-14 and Response to NSRRD2-12, adequate characterization of the environmental setting was performed including protocol-level surveys for plants, Swainson's hawk, and burrowing owl. No additional response is required. The comment does not raise any specific issues related to the proposed project or the IS/MND.

Response to NSRRD2-68

The commenter summarizes text from the IS/MND making the case that no evidence of raptor nests, wildlife dens or burrows, or other sensitive habitats have been identified from the project area, concluding that there would be no significant impacts to wildlife or other sensitive habitats.

This comment is noted. With mitigation, as stated in the IS/MND, this comment is correct, there would be no significant impacts to wildlife or other sensitive habitats. No additional response is required.

Response to NSRRD2-69

The commenter states that there would be potentially significant impacts from the project and describes surveys they have performed for other warehouse projects including before and after control-intervention studies that purported to detect declines in wildlife abundance and richness.

This comment is noted. No additional response is required.

Response to NSRRD2-70

The commenter describes how habitat loss consists of numerical declines of wildlife and also loss of "productive capacity" due to habitat fragmentation. The commenter describes methods for estimating the loss of productive capacity.

This comment is noted. See Response to NSRRD2-21 above. No additional response is required.

Response to NSRRD2-71

The commenter relates the results of studies on avian abundance in different habitats that have been fragmented. The commenter describes data they collected on nest abundance at a location in Southern California.

This comment is noted. No additional response is required.

Response to NSRRD2-72

The commenter states that loss of nest sites and nest attempts would qualify as significant impacts for the purposes of the IS/MND. The commenter provides calculations where they estimate the number of birds that will be lost due to project implementation.

Comment noted. While the calculations and studies presented by the commenter are interesting, they are contradicted by the environmental conditions on-site. The proposed project would not increase habitat fragmentation because the project site is surrounded on three sides by industrial development and would not isolate patches of habitat from other patches of habitat, which is the scientific definition of habitat fragmentation.

Additionally, there is little to no suitable habitat for nesting in the project area, and no nesting birds were observed in the project area during 10 protocol-level avian surveys in 2022 and 2023. Thus, the commenter's claim that project implementation will result in the loss of 1,113 birds per year is difficult to reconcile with the observation that no nests have so far been observed in the project area. No additional response is required.

Response to NSRRD2-73

The commenter states that many of the 1,113 birds that could be lost annually are protected by various State and federal laws, resulting in significant project impacts.

Comment noted. See Response to NSRRD2-72. No additional response is required.

Response to NSRRD2-74

The commenter states that traffic-related impacts to wildlife account for numerous mortality events each year for birds, reptiles, mammals, amphibians, and arthropods. The commenter provides statistics for traffic-related mortality in the United States and Canada.

This comment is noted. No additional response is required.

Response to NSRRD2-75

The commenter provides statistics on traffic-related mortality along Vasco Road in Contra Costa County. The commenter estimates the number of wildlife killed by traffic per mile per year and states that an analysis is needed to determine whether increased traffic at the project site will result in local impacts on wildlife.

This comment is noted. CDFW did not find issue with the lack of conversation related to traffic-related mortality within the IS/MND. Impacts of traffic-related mortality are not a threshold held under CEQA or identified by the lead agency and is therefore not a necessary component that need to be addressed. Additionally, Vasco Road in Contra Costa County is a significantly busier road than Technology Way or Morris Court which bound the project site. The commenter's calculations are speculative to the amount of traffic-related mortality that the project would produce due to the type of road analyzed in his sample study. No additional response is required.

Response to NSRRD2-76

The commenter states that special-status species such as California tiger salamander and California red-legged frog could suffer traffic collision mortality.

This comment is noted. See Response to NSRRD2-75 above. No additional response is required.

Response to NSRRD2-77

The commenter cites scientific literature to estimate the number of individuals killed along Vasco Road in Contra Costa County. The commenter lists the various species that were observed and states that VMT is an effective metric for predicting wildlife mortality.

This comment is noted. No additional response is required.

Response to NSRRD2-78

The commenter calculates wildlife fatalities for the proposed project based on VMT from the IS/MND and mortality estimates from the Vasco Road study and concludes that 399 vertebrate fatalities per year would result.

Comment noted. The calculations provided are interesting and potentially useful, however parameterizing these calculations with data from Vasco Road and comparing them to the project site is problematic. Vasco Road is in a rural area surrounded by undeveloped land and runs along a major wildlife corridor in the Altamont Pass. In contrast, the project area is surrounded on three sides by industrial development and is not a known wildlife movement corridor. These factors significantly affect the number of roadway deaths, making the calculations from Vasco Road inapplicable to the project site.

It is equally conceivable that development of the proposed buildings will prevent animals from migrating from the Sheehy Creek corridor onto Technology Way. Currently there are no barriers preventing animals from migrating onto Technology Way from Sheehy Creek. Thus, implementation of the proposed project could actually reduce wildlife mortality from traffic. No additional response is required.

Response to NSRRD2-79

The commenter states that based on their analysis, traffic may cause significant impacts to wildlife. The commenter states that the IS/MND does not consider this possibility and that mitigation measures for avoidance of traffic mortality are available and feasible.

Comment noted. See Response to NSRRD2-78. No additional response is required.

Response to NSRRD2-80

The commenter recommends that MM BIO-1 be amended such that silt fencing is placed 300 feet from the top of bank of Sheehy Creek.

Comment noted. See Response to NSRRD2-23 above. CDFW reviewed the IS/MND and did not have any comments regarding the placement of silt fencing along the edge of the riparian corridor. Placement of silt fencing 300 feet south of the top of bank of Sheehy Creek is not a practical recommendation, since the width of the project area between Sheehy Creek and Technology Way ranges from 350 to 440 feet, leaving only 50-140 feet of buildable space. No additional response is required.

Response to NSRRD2-81

The commenter claims that MM BIO-2 "misrepresents CDFW (2018) as a pre-construction survey rather than as a reconnaissance survey" and that implementing CDFW (2018) "would not qualify as a legitimate mitigation measure."

Comment noted. See Response to NSRRD2-24 above. Rare plant surveys that follow the CDFW (2018) guidelines are typically called "protocol level", whereas "reconnaissance level" surveys are those that are less thorough and preliminary in nature. MM BIO-2 proposes protocol-level surveys to be performed the spring before construction begins, in addition to the five protocol-level surveys that were performed on the project site by Pinecrest in 2023. If protocol-level surveys are performed, these can be considered more effective than pre-construction or reconnaissance surveys.

Response to NSRRD2-82

The commenter states that MM BIO-3 would not detect all available nests nor prevent the loss of "productive capacity." The commenter also states that MM BIO-3". . . allows a single individual to make a subjective decision [about buffer width], outside the public's view. . . and lacks objective criteria."

Comment noted. MM BIO-3 states that the project Biologist will consult with CDFW, a public agency, to determine buffer widths. No additional response is required.

Response to NSRRD2-83

The commenter recommends that MM BIO-6 require implementation of the CDFW (2012) protocols including breeding season surveys. The commenter states surveys should be completed prior to CEQA review, not after.

Comment noted. As described in Response to NSRRD2-11 above, the CDFW (2012) burrowing owl protocols including breeding season surveys were already completed in 2022 and 2023 and will be performed again the year construction is scheduled to begin.

Response to NSRRD2-84

The commenter states that exclusion fencing should be fitted with one-way passages to ensure that animals can move from the project site to the Sheehy Creek riparian corridor but not the other direction. The commenter states that even with these passages, there would be "substantial, highly significant impact to amphibians such as yellow-legged frog."

Comment noted. The recommendation to install one-way passages is a good idea and should be easy to implement. However, it is not substantiated that there will be "substantial, highly significant impacts" to amphibians despite pre-construction surveys and exclusion fencing required by MM BIO-8. Nor is there substantial evidence that the one-way passages would result in a substantial reduction of the already less than significant impacts. There have been no amphibians observed in the project area during any of the surveys performed at the project site, and no yellow-legged frogs observed in Sheehy Creek. It is unlikely that amphibians would migrate from the riparian corridor onto the project area in substantial numbers due to the lack of fossorial mammal burrows or cracks in the ground suitable for estivation, because of the history of disking. Pre-construction surveys required by MM BIO-8, as well as exclusion fencing and installation of one-way passages, will reduce the likelihood of impacts to amphibians to less than significant. No additional response is required.

Response to NSRRD2-85

The commenter, Daniel T. Smith, Jr. of Smith Engineering & Management, states in a letter dated November 12, 2024, that the VMT impacts were improperly evaluated by separately analyzing Buildings A and B. The commenter also raises an issue relative to the trip generation and need to treat the office space separately as opposed to being ancillary to the warehouse function.

Comment noted. The projects are on separate parcels and are intended to be owned and managed separately; a single traffic study was prepared as both projects are proceeding at the same time. Although the projects were analyzed separately, the IS/MND properly analyzes the whole of the project because the combined traffic impacts were considered via the cumulative impacts discussion within the IS/MND.

However, under the County's VMT policy, projects that do not screen out are required to reduce their VMT by 15 percent to mitigate their potential impact. The recommendation to prepare a TDM Plan can be applied to both buildings rather than to Building B, if the County deems it necessary. With implementation of trip reduction measures by 15 percent, the impacts for both buildings would be less than significant.

It is noted that for Building B the office space is indicated as 11,000 square feet out of a total of 66,915 square feet, or approximately 16 percent of the total floor area. The description provided in the *Trip Generation Manual*, 11th Edition, for "Warehouse" (Land Use 150) says, "A warehouse is primarily devoted to the storage of materials, but it may also include office and maintenance areas." As almost 84 percent of the building would be dedicated to warehouse uses, it is reasonable to conclude that this is the primary use, making the application of this rate to the entire space consistent with the land use designation.

As a point of comparison, it is noted that application of trip generation rates for an office use versus a warehouse use for the 11,000 square feet of that use proposed in Building B would increase the trip generation by 10 trips during the AM peak-hour and one during the PM peak-hour, with 67 more trips on a daily basis. However, as the building was already anticipated to generate more than 110 daily trips, so has a recommended measure to mitigate potential VMT impacts, the change in the trip generation would have no effect on the findings or conclusions of the analysis. Similarly, the limited number of additional peak-hour trips would reasonably be expected not to result in any new adverse effects, though it is noted that this issue is not related to CEQA, so would have no effect on the Initial Study.

Based on the details provided above, the potentially significant transportation impacts of the project have already been identified and mitigations identified; hence an EIR is not warranted with respect to further evaluating potential transportation impacts. No additional response is required.

Errata

The following are revisions to the IS/MND for the proposed project. These revisions are minor modifications and clarifications to the document, and do not change the significance of any of the environmental issue conclusions within the IS/MND. The revisions are listed by page number. All additions to the text are underlined (underlined) and all deletions from the text are stricken (stricken).

Section IV. Biological Resources

Page 2, Section 10, Only Paragraph

The following edit has been made because of CDFW recommendations to include language for the potential for "take" of listed species.

The proposed project does not involve the "take" of listed endangered or threatened species, and thus does not require a "take permit" from the Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, or the National Marine Fisheries Service.

Nonetheless, MM BIO-6 includes requirements if a “take permit” from the Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, or the National Marine Fisheries Service” is required.

Page 12-13, Section IV Biological Resources, Seventh Paragraph

This edit was made in response to CDFW’s recommendation to include mitigation language in case avoidance of burrowing owls is not possible and an ITP is required. The addition of this language ensures the effectiveness of MM BIO-6, but does not have any impact on the significance conclusions in the IS/MND.

MM BIO-6 **(Burrowing Owl Habitat Assessment and Surveys):** A qualified Biologist shall conduct a habitat assessment and surveys for wintering burrowing owls prior to construction if construction starts during the burrowing wintering season (September 1 to January 31) Surveys shall be conducted if warranted based on the habitat assessment. The habitat assessment and surveys shall follow the Department of Fish and Game Staff Report on Burrowing Owl Mitigation (2012) methodology (<https://wildlife.ca.gov/Conservation/Survey-Protocols#377281284-birds>) and the qualified Biologist shall prepare a report documenting the survey results. The habitat assessment and surveys shall encompass the Project site and a sufficient buffer zone to detect owls nearby that may be impacted, which is up to 500 meters (1,640 feet) around the Project site pursuant to the above methodology. Habitat assessments and surveys shall occur each year of project construction, as conditions may change annually and suitable refugia for burrowing owl, such as small mammal burrows, can be created within a few hours or days, unless otherwise approved in writing by CDFW.

Surveys for nonbreeding burrowing owls shall be spread over four visits during the nonbreeding season (i.e., wintering), September 1 to January 31. Time lapses between surveys or project activities shall trigger subsequent surveys including, but not limited to, a final survey within 24 hours prior to ground disturbance. The qualified Biologist shall have a minimum of 2 years of experience implementing the above methodology resulting in burrowing owl detections. The Biologist shall immediately notify CDFW if burrowing owl is detected and implement a construction avoidance buffer around any detected burrowing owl pursuant to the buffer distances outlined in the Department of Fish and Game Staff Report on Burrowing Owl Mitigation (2012), which may be up to 500 meters (1,640 feet). Any detected owl shall be monitored by the qualified Biologist to ensure it is not disturbed during construction activities, unless otherwise approved in writing by CDFW.

If take of burrowing owl (BUOW) cannot be avoided, the Biologist shall consult with CDFW pursuant to CESA and obtain an ITP before Project activities commence. Take is likely to occur and the Biologist shall obtain an ITP if: (1) BUOW surveys of the Project site detect BUOW occupancy of burrows or burrow surrogates, or (2) there is sign of BUOW occupancy on the Project site within the past 3 years and habitat has not had any substantial change that would make it no longer suitable within the past 3 years. Occupancy means a site that is assumed occupied if at least one BUOW has been

observed occupying a burrow or burrow surrogate within the last 3 years. Occupancy of suitable BUOW habitat may also be indicated by BUOW sign including its molted feathers, cast pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance or perch site. If BUOW, or their burrows or burrow surrogates, are detected within 500 meters (1,640 feet) of the Project site during BUOW surveys, but not on the Project site, the Biologist shall consult with CDFW to determine whether avoidance is feasible, or an ITP is warranted and shall obtain an ITP if deemed necessary by CDFW.

Section VIII. Greenhouse Gas Emissions

Page 18, Impact GHG-1, Fifth Paragraph

The following edit has been made to clarify the California Green Building Standards Code (CALGreen) electric vehicle (EV) charging requirements for warehouse buildings.

CALGreen's Tier 2 Voluntary Provisions are voluntary in nature and are not required by CALGreen or the County. The Project will comply with CALGreen EV charging requirements for nonresidential new construction which include EV capable and EV charging station requirements, and requirements for warehouses which include provisions to provide capacity for raceway, busway, transformer, and panel to serve future EV trucks. These features support long-term reductions in mobile-source emissions and align with state and regional climate goals, including AB 32, SB 32, and Executive Order B-55-18. The project will be required to comply with the recently adopted version of CALGreen Tier 2. Project approval will include a condition of approval to ensure this is reviewed and implemented at the time of construction through adherence to the California Building Code. Therefore, the Project is consistent with this design standard.



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SPECIAL-STATUS AVIAN SURVEY REPORT

Date: January 29, 2024
To: Robert Carroll, FCS International
From: Dr. Christopher T. DiVittorio, Pinecrest Research Corp., Inc.
Subject: Results of special-status avian surveys at Technology Way, Napa County, CA (APN 057-250-030, 057-250-031, 057-250-032; FCS Project 5639.0001)

Robert Carroll,

This special-status avian survey report (Report) details the findings of ten (10) avian surveys conducted between December 8, 2022 and June 21, 2023 at the above-referenced property located in the County of Napa. The property consists of three parcels assigned Napa County APN 057-250-030, 057-250-031, and 057-250-032 (Figures 1 & 2). The parcels measure 13.53, 4.9, and 2.23 acres, respectively, and are currently undeveloped, although they are surrounded on the east, west, and south by commercial warehouses. Surveys were conducted in order to determine the presence or absence of the following special-status animals: burrowing owl (*Athene cunicularia*), Swainson's hawk (*Buteo swainsoni*), nesting raptors, and nesting passerine birds. Surveys for these species were recommended to be performed according to a Biological Resources Assessment (BRA) prepared for the property by FCS International dated January 2, 2023. Surveys were conducted by consulting biologist Dr. Christopher DiVittorio.

Site Description

The portion of the property that is the proposed project area is composed of disked and mowed ruderal grassland (Figure 3). Sheehy Creek flows west along the north boundary of the property, however the entirety of the Sheehy Creek riparian corridor is in a conservation easement and is not part of the proposed project area. The conservation easement is separated from the project area along the entirety of its length by a paved pedestrian pathway. The ruderal grassland that comprises the project area exhibits low species diversity and few native plant species due to the history of disking and mowing. The vegetation type of the project area as determined by Sawyer et al. (2009) *Manual of California Vegetation 2nd Edition* (MCV)¹ is *Bromus (diandrus, hordeaceous)-Brachypodium distachyon* Semi-Natural Herbaceous Stand.

Methods

Between December 8, 2022 and June 21, 2023, ten (10) surveys were conducted for nesting passerine birds, raptors (including Swainson's hawk), and burrowing owl. During each survey, the entirety of the project area was examined on foot. These surveys included the entirety of the project area on all three parcels, as well visual inspection of the Sheehy Creek conservation easement on the north property

¹ Sawyer, J.O., T. Keeler-Wolf, J. Evens. 2009. *Manual of California Vegetation*. California Native Plant Society Press, Sacramento, CA.

boundary that is not part of the project area but is adjacent to it. Areas on adjacent parcels were also examined with binoculars where possible. A total of approximately 30 survey hours were completed across all survey dates.

Survey methods followed established procedures and applicable protocols, including the *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley*, and the *Staff Report on Burrowing Owl Mitigation*.^{2,3} Survey equipment included high-quality binoculars and a high-quality spotting scope. Surveys were conducted during the appropriate times of day (including peak bird detection periods between sunrise and 10 a.m.). Surveys were conducted on foot. Survey dates with the corresponding Swainson's hawk survey periods are shown below, although all species of birds were surveyed for at each time period. The survey on 12/8/22 was technically prior to the beginning of Swainson's hawk Period 1 as described in the 2000 protocol², however this sample period is only recommended and primarily used to determine the presence or absence of suitable habitat onsite.

Date	Swainson's Hawk Survey Period
12/8/2022	1 st survey in Period I
3/20/2023	1 st survey in Period II
3/31/2023	2 nd survey in Period II
4/4/2023	3 rd survey in Period II
4/5/2023	1 st survey in Period III
4/6/2023	2 nd survey in Period III
4/7/2023	3 rd survey in Period III
4/24/2023	1 st survey in Period IV
5/29/2023	2 nd survey in Period IV
6/21/2023	1 st survey in Period V

Results & Recommendations

Transcribed field notes from each of the ten site visits are provided in Appendix A, and a master list of all species of birds encountered across the ten site visits is provided in Appendix B. A total of 16 unique species of birds were observed in the project area, and 52 unique species of birds observed in the Sheehy Creek conservation easement. The lack of birds observed in the project area was likely due to the lack of suitable nesting habitat on the project area itself, which is composed of disked ruderal grassland that is periodically mowed.

No special-status species including Swainson's hawk or burrowing owl were observed in the project area. Three special-status species were observed in the Sheehy Creek conservation easement--white-tailed kite, loggerhead shrike, and red-tailed hawk--however this easement is not in the project area. Additionally, none of these species were engaged in nesting behaviors and were not actively foraging in the project area. No nesting birds were observed in the project area. Nesting birds observed in the Sheehy Creek riparian corridor included red-shouldered blackbird and Anna's hummingbird.

² Swainson's Hawk Technical Advisory Committee. 2000. *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley*. California Department of Fish and Wildlife, May 31, 2000.

³ California Department of Fish and Wildlife 2012. *Staff Report on Burrowing Owl Mitigation*. State of California Natural Resource Agency Department of Fish and Game. March 7, 2012.

Swainson's Hawk

No individuals of Swainson's hawk were observed during any of the surveys. One raptor nest was observed in the conservation easement of Sheehy Creek in a cottonwood tree, the location of which is indicated in Figure 1. Repeated observations of this nest showed that it was not active during 2023 and has fallen into disrepair. The presence of red-tailed hawk (*Buteo jamaicensis*) and white-tailed kite soaring in the vicinity of the project area also suggests that Swainson's hawk are not utilizing this habitat currently since these species are antagonistic and do not typically share ranges. The negative survey results for Swainson's hawk despite approximately 30 survey hours satisfies the requirements of the survey protocol for this species, therefore it is reasonable to conclude Swainson's hawk are absent from the project area.

Nesting Raptors

No active raptor nests were observed in the vicinity of the project area. One raptor nest was observed in the conservation easement of Sheehy Creek in the location indicated in Figure 1, however repeated observations of this nest showed that it was not active during 2023 and has fallen into disrepair. Pairs of red-tailed hawk (*Buteo jamaicensis*) and white-tailed kite (*Elanus leucurus*) were occasionally observed soaring over the project area, and occasionally perching on adjacent buildings and trees within the Sheehy Creek conservation easement, however none of these birds behaved in a way that indicated any nest building activity was occurring on or near the project area. Although red-tailed hawks occasionally flew over the project area, they did not appear to be actively foraging in the project area. The frequent disking and mowing of the project area typically precludes the existence of small mammal burrows, thus it is likely that the project area is not high quality foraging habitat for raptors.

Other Nesting Birds

No active nests of any other bird species were observed within the project area. Nests of red-shouldered blackbird (*Agelaius phoeniceus*) and Anna's hummingbird (*Calypte anna*) were observed in the Sheehy Creek conservation easement, however these species are not special-status and their nests were outside of the proposed project area. These species are typically very tolerant of human activity, thus it is reasonable to conclude that construction in the project area would not significantly affect or preclude continued nesting of these species in the Sheehy Creek conservation easement.

Burrowing Owl

No evidence of burrowing owl activity was observed during any of the ten field surveys. No California ground squirrel burrows were observed on-site, and no other burrows or dens were observed in the project area that would provide suitable nesting habitat for burrowing owl. Frequent disking and mowing of the project area precludes the existence of small mammal burrows due to severe disturbance of the upper soil horizon. Therefore, it is reasonable to conclude burrowing owl is absent from the project area.

Please contact me at the email or phone number below if you have any questions about this or any other studies we've performed for this project.

PINECREST RESEARCH CORPORATION, INC.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris", with a stylized, wavy underline.

Christopher DiVittorio, PhD
President, PEC
(510) 881-3039
chris@pinecrestenvironmental.org

Figure 1: Site Map - West



Figure 2: Site Map - East



Pinecrest Environmental Consulting
www.pinecrestenvironmental.org

SOURCES: Google Earth; PEC Inc.

APN 057-250-030, 057-250-031, 057-250-032
E&P Technology Way, Napa, CA 94558

Figure 3: Ruderal Grassland



SOURCES: PEC Inc.

APN 057-250-030, 057-250-031, 057-250-032
E&P Technology Way, Napa, CA 94558

Appendix A: Animal Survey Field Notes

The following is a transcription of field notes for each of the ten (10) protocol-level surveys conducted at the project area and the Sheehy Creek conservation easement.

Site Visit: 12/8/22

Time: 10:00 AM

Weather: clear, 50 degF, 66% RH, wind 2-4 mph

Notes: most of project area recently disked; nest in cottonwood tree in Sheehy Creek conservation easement does not look maintained and is not in use; 2 adult red-tailed hawk soaring above conservation easement and landing on nearby buildings

Purpose: Swainson's hawk, other raptor, nesting bird, BUOW

Personnel: Dr. Christopher DiVittorio

Bird Species in Project Area: crow (*Corvus brachyrhynchos*), kildeer (*Charadrius vociferus*), rock pigeon (*Columba livia*), turkey vulture (*Cathartes aura*)

Bird Species in Conservation Easement: crow (*Corvus brachyrhynchos*), red-tailed hawk (*Buteo jamaicensis*), white-crowned sparrow (*Zonotrichia leucophrys*), mourning dove (*Zenaida macroura*), loggerhead shrike (*Lanius ludovicianus*), dark-eyed junco (*Junco hyemalis*), rufous-crowned sparrow (*Aimophila ruficeps*), black phoebe (*Sayornis nigricans*), rock pigeon (*Columba livia*), Western scrub jay (*Aphelocoma californica*), unknown gull, Anna's hummingbird (*Calypte anna*), Hutton's vireo (*Vireo huttoni*), turkey vulture (*Cathartes aura*)

Other Animals: American beaver (*Castor canadensis*) dams located in Sheehy Creek appear active; runways of California vole (*Microtus californicus*)

Site Visit: 3/20/23

Time: 8:15 AM

Weather: no wind, 49 degF, 46% RH

Notes: old raptor nest in cottonwood tree not active; sticks falling down, looks in disrepair

Purpose: Swainson's hawk, other raptor, nesting bird, BUOW

Personnel: Dr. Christopher DiVittorio

Bird Species in Project Area: red-shouldered blackbird (*Agelaius phoeniceus*), California towhee (*Melospiza crissalis*), crow (*Corvus brachyrhynchos*), song sparrow (*Melospiza melodia*), rock pigeon (*Columba livia*), mourning dove (*Zenaida macroura*), Western meadowlark (*Sturnella neglecta*), kildeer (*Charadrius vociferus*)

Bird Species in Conservation Easement: red-shouldered blackbird (*Agelaius phoeniceus*), great egret (*Ardea alba*), California towhee (*Melospiza crissalis*), crow (*Corvus brachyrhynchos*), tree swallow (*Tachycineta bicolor*), mallard ducks (*Anas platyrhynchos*), bushtit (*Psaltriparus minimus*), savannah sparrow (*Passerculus sandwichensis*), song sparrow (*Melospiza melodia*), horned lark (*Eremophila alpestris*), rock pigeon (*Columba livia*), sora (*Porzana carolina*), mourning dove (*Zenaida macroura*), kildeer (*Charadrius vociferus*)

Other Animals: dam of American beaver (*Castor canadensis*) on Sheehy Creek observed, black-tailed jackrabbit (*Lepus californicus*)

Site Visit: 3/31/23

Time: 7:45 AM

Weather: clear then partly cloudy by mid-day, wind 0 mph, 44.5 degF, 76.5% RH

Notes: no activity at stick nest in cottonwood tree; no raptors observed soaring today

Purpose: Swainson's hawk, other raptor, nesting bird, BUOW

Personnel: Dr. Christopher DiVittorio

Bird Species in Project Area: American robin (*Turdus migratorius*), Western meadowlark (*Sturnella neglecta*), white-crowned sparrow (*Zonotrichia leucophrys*), crow (*Corvus brachyrhynchos*), song sparrow (*Melospiza melodia*), house finch (*Haemorhous mexicanus*), barn swallow (*Hirundo rustica*) (soaring overhead high altitude)

Bird Species in Conservation Easement: American robin (*Turdus migratorius*), red-shouldered blackbird (*Agelaius phoeniceus*), Western scrub jay (*Aphelocoma californica*), white-crowned sparrow (*Zonotrichia leucophrys*), hermit thrush (*Catharus guttatus*), Virginia rail (*Rallus limicola*), Lawrence's goldfinch (*Spinus lawrencei*), crow (*Corvus brachyrhynchos*), raven (*Corvus corax*), song sparrow (*Melospiza melodia*), California towhee (*Melozone crissalis*), Northern mockingbird (*Mimus polyglottos*), mallard ducks (*Anas platyrhynchos*), Canada goose (*Branta canadensis*), yellow-rumped warbler (*Setophaga coronata*), California gull (*Larus californicus*), house finch (*Haemorhous mexicanus*), barn swallow (*Hirundo rustica*) (soaring overhead high altitude), European starling (*Sturnus vulgaris*)

Site Visit: 4/4/23

Start time: 7:35 AM

Weather: clear and sunny, 49 degF, no wind, 81% RH

Notes: stick nest in cottonwood tree still inactive; sticks falling down; cottonwood just leafing out; pair of hawks perching on large dead tree offsite approx. 0.2 mile N of parcel; white tail kite perching on cottonwood tree in Sheehy Creek easement, but not nesting or acting territorial, left after 15 min

Purpose: Swainson's hawk, other raptor, nesting bird, BUOW

Personnel: Dr. Christopher DiVittorio

Bird Species in Project Area: Western meadowlark (*Sturnella neglecta*), red-shouldered blackbird (*Agelaius phoeniceus*), song sparrow (*Melospiza melodia*), California towhee (*Melozone crissalis*), house finch (*Haemorhous mexicanus*), crow (*Corvus brachyrhynchos*)

Bird Species in Conservation Easement: red-shouldered blackbird (*Agelaius phoeniceus*), crow (*Corvus brachyrhynchos*), song sparrow (*Melospiza melodia*), California towhee (*Melozone crissalis*), mourning dove (*Zenaidura macroura*), house finch (*Haemorhous mexicanus*), yellow-rumped warbler (*Setophaga coronata*), European starling (*Sturnus vulgaris*), American robin (*Turdus migratorius*), rock pigeon (*Columba livia*), ruby-crowned kinglet (*Regulus calendula*), crow (*Corvus brachyrhynchos*), unidentified species of sparrow, Canada goose (*Branta canadensis*), black phoebe (*Sayornis nigricans*), tree swallow (*Tachycineta bicolor*), white-throated sparrow (*Zonotrichia albicollis*), marsh wren (*Cistothorus palustris*), wild turkey (*Meleagris gallopavo*), mallard ducks (*Anas platyrhynchos*), bufflehead (*Bucephala albeola*), Western kingbird (*Tyrannus verticalis*), Western scrub jay (*Aphelocoma californica*), unknown hummingbird (likely Allen's or rufous), white-tailed kite (*Elanus leucurus*)

Other Animals: dam of American beaver (*Castor canadensis*), calls of Pacific tree frog (*Pseudacris regalia*)

Site Visit: 4/5/23

Start time: 7:45 AM

Weather: clear and sunny, 45 degF, no wind, 80% RH

Notes: white-tail kite perching on cottonwood tree with nest but is not near or paying attention to the nest; nest still inactive; second white-tail kite hovering nearby, both flushed after several minutes; 2 large raptors, unknown species, perching on large dead tree offsite 0.2 miles to the north

Purpose: Swainson's hawk, other raptor, nesting bird, BUOW

Personnel: Dr. Christopher DiVittorio

Bird Species in Project Area: red-shouldered blackbird (*Agelaius phoeniceus*), crow (*Corvus brachyrhynchos*), mourning dove (*Zenaida macroura*), house finch (*Haemorhous mexicanus*), house sparrow (*Passer domesticus*), American robin (*Turdus migratorius*), barn swallow (*Hirundo rustica*), cliff swallow (*Petrochelidon pyrrhonota*), Western meadowlark (*Sturnella neglecta*)

Bird Species in Conservation Easement: red-shouldered blackbird (*Agelaius phoeniceus*), crow (*Corvus brachyrhynchos*), rock pigeon (*Columba livia*), mourning dove (*Zenaida macroura*), song sparrow (*Melospiza melodia*), European starling (*Sturnus vulgaris*), Bewick's wren (*Thryomanes bewickii*), marsh wren (*Cistothorus palustris*), yellow-rumped warbler (*Setophaga coronata*), bushtit (*Psaltiriparus minimus*), house finch (*Haemorhous mexicanus*), house sparrow (*Passer domesticus*), American robin (*Turdus migratorius*), lesser goldfinch (*Spinus psaltria*), barn swallow (*Hirundo rustica*), cliff swallow (*Petrochelidon pyrrhonota*), blue-gray gnatcatcher (*Polioptila caerulea*), black phoebe (*Sayornis nigricans*), white-tailed kite (*Elanus leucurus*), Anna's hummingbird (*Calypte anna*)

Site Visit: 4/6/23

Start time: 7:30 AM

Weather: clear and sunny, 44 degF, 50% RH, no wind

Notes: no activity at nest in cottonwood tree

Purpose: Swainson's hawk, other raptor, nesting bird, BUOW

Personnel: Dr. Christopher DiVittorio

Bird Species in Project Area: red-shouldered blackbird (*Agelaius phoeniceus*), American robin (*Turdus migratorius*), crow (*Corvus brachyrhynchos*), song sparrow (*Melospiza melodia*), Western meadowlark (*Sturnella neglecta*), cliff swallow (*Petrochelidon pyrrhonota*), great egret (*Ardea alba*) foraging in field, house finch (*Haemorhous mexicanus*)

Bird Species in Conservation Easement: California towhee (*Melospiza crissalis*), American robin (*Turdus migratorius*), crow (*Corvus brachyrhynchos*), song sparrow (*Melospiza melodia*), yellow-rumped warbler (*Setophaga coronata*), white-crowned sparrow (*Zonotrichia leucophrys*), cliff swallow (*Petrochelidon pyrrhonota*), Bewick's wren (*Thryomanes bewickii*), house finch (*Haemorhous mexicanus*), mourning dove (*Zenaida macroura*), Northern mockingbird (*Mimus polyglottos*), Anna's hummingbird (*Calypte anna*), loggerhead shrike (*Lanius ludovicianus*), white-tailed kite (*Elanus leucurus*)

Site Visit: 4/7/23

Start time: 7:30 AM

Weather: cloudy with light rain, 54 degF, 81% RH, wind 1-2 mph, fewer birds today

Notes: fewer birds today likely due to rain; white-tail kite perching on cottonwood but not using or interested in the dilapidated nest; nest in cottonwood tree inactive; juvenile red-tailed kite perching in Eucalyptus trees offsite to E of project area, flew away after several minutes;

Purpose: Swainson's hawk, other raptor, nesting bird, BUOW

Personnel: Dr. Christopher DiVittorio

Bird Species in Project Area: song sparrow (*Melospiza melodia*), red-shouldered blackbird (*Agelaius phoeniceus*), crow (*Corvus brachyrhynchos*), house finch (*Haemorhous mexicanus*), violet-green swallow (*Tachycineta thalassina*)

Bird Species in Conservation Easement: Bewick's wren (*Thryomanes bewickii*), song sparrow (*Melospiza melodia*), red-shouldered blackbird (*Agelaius phoeniceus*), Northern mockingbird (*Mimus polyglottos*), American robin (*Turdus migratorius*), crow (*Corvus brachyrhynchos*), white-tailed kite (*Elanus leucurus*), dark-eyed junco (*Junco hyemalis*), black phoebe (*Sayornis nigricans*), California towhee (*Melospiza crissalis*), yellow-rumped warbler (*Setophaga coronata*), house finch (*Haemorhous mexicanus*), great egret (*Ardea alba*), white-crowned sparrow (*Zonotrichia leucophrys*), mourning dove (*Zenaidura macroura*), Anna's hummingbird (*Calypte anna*), violet-green swallow (*Tachycineta thalassina*), mallard ducks (*Anas platyrhynchos*), Western kingbird (*Tyrannus verticalis*), great blue heron (*Ardea herodias*)

Site Visit: 4/24/23

Start time: 10:25 AM

Weather: cloudy, then sunny; 61 degF, 64% RH, 1-3 mph wind

Notes: no activity at nest in cottonwood tree

Purpose: Swainson's hawk, other raptor, nesting bird, BUOW

Personnel: Dr. Christopher DiVittorio

Bird Species in Project Area: red-shouldered blackbird (*Agelaius phoeniceus*), crow (*Corvus brachyrhynchos*), house finch (*Haemorhous mexicanus*), violet-green swallow (*Tachycineta thalassina*)

Bird Species in Conservation Easement: red-shouldered blackbird (*Agelaius phoeniceus*), violet-green swallow (*Tachycineta thalassina*), California towhee (*Melospiza crissalis*), dark-eyed junco (*Junco hyemalis*), black phoebe (*Sayornis nigricans*), lesser goldfinch (*Spinus psaltria*), crow (*Corvus brachyrhynchos*), Anna's hummingbird (*Calypte anna*), European starling (*Sturnus vulgaris*), white-crowned sparrow (*Zonotrichia leucophrys*), turkey vulture (*Cathartes aura*), mourning dove (*Zenaidura macroura*), white-tailed kite (*Elanus leucurus*) soaring and hovering over field, unidentified species of sparrow

Site Visit: 5/29/23

Start time: 8:35 AM

Weather: sunny

Notes: nest in cottonwood tree not active

Purpose: Swainson's hawk, BUOW

Personnel: Dr. Christopher DiVittorio

Bird Species in Project Area: no sign of BUOW or Swainson's hawk; presence/absence survey only; no comprehensive bird list completed

Site Visit: 6/21/23

Start time: 11:00 PM

Weather: clear, sunny, 74 degF, 51% RH, 3-6 mph wind

Note: many species appear to have migrated offsite for the summer; site has been recently mowed

Purpose: Swainson's hawk, other raptor, nesting bird, BUOW

Personnel: Dr. Christopher DiVittorio

Bird Species in Project Area: no sign of BUOW or Swainson's hawk; presence/absence survey only; no comprehensive bird list completed

Appendix B: Master Species List

The following is a list of bird species observed across the ten (10) site visits at the project area and Sheehy Creek conservation easement. Special-status species are denoted with an asterisk (*).

Bird Species in Project Area

robin (*Turdus migratorius*)
barn American swallow (*Hirundo rustica*)
California towhee (*Melospiza crissalis*)
cliff swallow (*Petrochelidon pyrrhonota*)
crow (*Corvus brachyrhynchos*)
great egret (*Ardea alba*) foraging in field
house finch (*Haemorrhous mexicanus*)
house sparrow (*Passer domesticus*)
kildeer (*Charadrius vociferus*)
mourning dove (*Zenaidura macroura*)
red-shouldered blackbird (*Agelaius phoeniceus*)
rock pigeon (*Columba livia*)
song sparrow (*Melospiza melodia*)
turkey vulture (*Cathartes aura*)
violet-green swallow (*Tachycineta thalassina*)
Western meadowlark (*Sturnella neglecta*)
white-crowned sparrow (*Zonotrichia leucophrys*)

Bird Species in Conservation Easement:

American robin (*Turdus migratorius*)
Anna's hummingbird (*Calypte anna*)
barn swallow (*Hirundo rustica*)
Bewick's wren (*Thryomanes bewickii*)
black phoebe (*Sayornis nigricans*)
blue-gray gnatcatcher (*Poliophtila caerulea*)
bufflehead (*Bucephala albeola*)
bushtit (*Psaltiriparus minimus*)
California gull (*Larus californicus*)
California towhee (*Melospiza crissalis*)
Canada goose (*Branta canadensis*)
cliff swallow (*Petrochelidon pyrrhonota*)
crow (*Corvus brachyrhynchos*)
dark-eyed junco (*Junco hyemalis*)
European starling (*Sturnus vulgaris*)
great blue heron (*Ardea herodias*)
great egret (*Ardea alba*)
hermit thrush (*Catharus guttatus*)
horned lark (*Eremophila alpestris*)
house finch (*Haemorrhous mexicanus*)
house sparrow (*Passer domesticus*)

Hutton's vireo (*Vireo huttoni*)
kildeer (*Charadrius vociferus*)
Lawrence's goldfinch (*Spinus lawrencei*)
lesser goldfinch (*Spinus psaltria*)
loggerhead shrike (*Lanius ludovicianus*)*
mallard ducks (*Anas platyrhynchos*)
marsh wren (*Cistothorus palustris*)
mourning dove (*Zenaida macroura*)
Northern mockingbird (*Mimus polyglottos*)
raven (*Corvus corax*)
red-shouldered blackbird (*Agelaius phoeniceus*)
red-tailed hawk (*Buteo jamaicensis*)
rock pigeon (*Columba livia*)
ruby-crowned kinglet (*Regulus calendula*)
rufous-crowned sparrow (*Aimophila ruficeps*)
savannah sparrow (*Passerculus sandwichensis*)
song sparrow (*Melospiza melodia*)
sora (*Porzana carolina*)
tree swallow (*Tachycineta bicolor*)
turkey vulture (*Cathartes aura*)
violet-green swallow (*Tachycineta thalassina*)
Virginia rail (*Rallus limicola*)
Western kingbird (*Tyrannus verticalis*)
Western scrub jay (*Aphelocoma californica*)
white-crowned sparrow (*Zonotrichia leucophrys*)
white-tailed kite (*Elanus leucurus*)*
white-throated sparrow (*Zonotrichia albicollis*)
wild turkey (*Meleagris gallopavo*)
yellow-rumped warbler (*Setophaga coronata*)
unidentified species of sparrow
unidentified species of gull
unidentified species of hummingbird (likely Anna's)

MEMORANDUM

Date: July 21, 2023

To: Jason Brandman, FCS International.

From: Dr. Christopher T. DiVittorio, Pinecrest Research Corp., Inc.

Subject: Results of special-status plant surveys at E&P Technology Way, Napa County, CA (FCS Project 5816.0001)

To Whom It May Concern,

This rare plant survey report (Report) details the findings of five protocol-level special-status plant surveys conducted in 2023 at the above-referenced property located in the County of Napa. The site consists of three parcels, a 13.5 acre parcel assigned APN 057-250-030, a 4.9 acre parcel assigned APN 057-250-031, and a 2.2 acre parcel assigned APN 057-250-032. This Report is intended to compliment the Biological Assessment (BA) dated January 2, 2023 that was previously prepared for this project.

Site Description

A full description of habitats and potential development constraints are presented in the BA. In summary, the majority of the site is disked ruderal grassland with low cover of plants and low species diversity (Figures 1 & 2). Due to repeated disking and mowing, the species onsite are primarily ruderal, early-successional species adapted to colonizing disturbed habitats. The habitat type of this area as determined by Sawyer et al. (2009) *Manual of California Vegetation 2nd Edition* (MCV) is *Bromus (diandrus, hordeaceous)-Brachypodium distachyon* Semi-Natural Herbaceous Stand. On the north side of the parcels, separated by a paved pedestrian walkway, is a conservation easement containing the recreated Sheehy Creek channel and riparian corridor, that was established and planted to native species as part of nearby developments in the past. The MCV classification of this habitat is *Salix laevigata (lasianдра)* Woodland Alliance and *Populus fremontii* Forest Alliance. The project will affect only the ruderal grassland portion of the site, thus the rare plant survey was limited to this portion of the property.

Methods

Rare plants are defined here to include: (1) all plants that are federal- or state-listed as rare, threatened or endangered, (2) all federal and state candidates for listing, (3) all plants included in Lists 1 through 4 of the CNPS Inventory (Skinner and Pavlik 1994), and (4) plants that qualify under the definition of "rare" in the California Environmental Quality Act, section 15380. Background information searches were conducted prior to all site visits to identify potential rare plant species or sensitive plant communities recognized by the California Department of Fish and Game (CDFG) that may occur in the Study Area vicinity. A table of these species, and their protection status, habitat requirements, and likelihood to occur in the Study Area is provided below. Sources for this search included the California Department of Fish and Game (CDFG) Natural Diversity Database (CDFG 2023) and the California Native Plant Society (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants of California (CNPS 2023).

Appendix A contains potential special-status species that were searched for based on plants known to exist in Napa County, and a "9-quad" search of all known special-status plant species from the surrounding region. In addition, plants known to occur within 5 miles of the project site are denoted with a description of the location of their nearest occurrence.

Site visits were performed during the growing season of 2023. Early-season site visits were performed on March 20 and March 31. Mid-season site visits were performed on April 24 and May 29. A late-season site visit was also performed on June 21. Site visits were performed by PEC botanist Dr. Christopher DiVittorio, with secondary identification on voucher and photograph specimens made by PEC botanist Dr. Zoya Akulova. During the site visit, Dr. DiVittorio surveyed the entirety of the project area using methods as specified in the California Department of Fish & Wildlife (CDFW) publication titled *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*, dated March 20, 2018. Field surveys were conducted by walking the entire project area on foot in parallel lines approximately 15 feet apart, identifying every species that was flowering, and making note of any species that were past flowering or that had not yet flowered. Voucher specimens were taken of any species that required identification in the laboratory. All terminology follows currently accepted nomenclature as described in *The Jepson Manual* (2012).

Results & Recommendations

The project area is comprised of routinely disked ruderal *Bromus (diandrus, hordeaceous)* semi-natural stands with some isolated individuals of *Baccharis pilularis* near the edges of the site. Due to the highly disturbed nature of the project site, all of the species found are early successional species adapted to colonizing new disturbances. As such, most of the species were non-native. No special-status native plant species or sensitive habitats were positively identified in the project area. A full list of the species encountered during the surveys is provided below in Appendix B. In total, 9 native species were observed onsite and 45 non-native species were observed.

No special-status species were found thus we have no recommendations for mitigation or avoidance for this project.

Please let me know if you have any questions about this or any other studies we've performed for this project.

Sincerely,



Christopher DiVittorio, PhD
President, PEC
(510) 881-3039
chris@pinecrestenvironmental.org

Figure 1: Habitat Map - West



Figure 2: Habitat Map - East



Appendix A: Special-Status Species Considered

The following is a list of sensitive and/or rare plants and habitats generated based on knowledge of the species and habitats of Napa County by PEC staff, from various State and Federal databases, and from the California Natural Diversity Database (CNDDDB). Known occurrences within 5 miles of the project site are shown in bold with a description of the location of the nearest known locality.

Taxon	Status ¹ Fed/State/CNPS	Habitat	Potential to Occur Within the Project Area
PLANTS			
Alkali milk-vetch (<i>Astragalus tener</i> var. <i>tener</i>)	—/—/1B.2	Alkali grassland	Very Low: No alkali habitat exists in the project area. Nearest known occurrence is 1.5 miles N of the project site near Bordeaux Way.
Anthony peak lupine (<i>Lupinus antoninus</i>)	—/—/1B.2	Coniferous forest	<u>None:</u> No coniferous forest habitat exists in the project area.
Baker's goldfields (<i>Lasthenia californica</i> ssp. <i>bakeri</i>)	—/—/1B.2	Coastal grasslands	<u>Very Low:</u> Some grassland habitat exists in the project area.
Baker's larkspur (<i>Delphinium bakeri</i>)	FE/SE/1B.1	Coastal scrub	<u>Very Low:</u> No coastal scrub habitat exists in the project area.
Baker's manzanita (<i>Arctostaphylos bakeri</i> ssp. <i>bakeri</i>)	—/—/1B.1	Serpentine chaparral	<u>None:</u> No serpentine chaparral exists in the project area.
Baker's navarretia (<i>Navarretia leucocephala</i> ssp. <i>bakeri</i>)	—/—/1B.1	Vernal pool	<u>None:</u> No vernal pool habitat exists in the project area.
Beaked tracyina (<i>Tracyina rostrata</i>)	—/—/1B.2	Grassland, foothill woodland	<u>Very Low:</u> Some grassland habitat exists in the project area.
Bent flowered fiddleneck (<i>Amsinckia lunaris</i>)	—/—/1B.2	Grassland, foothill woodland	<u>Very Low:</u> Some grassland habitat exists in the project area.
Big-scale balsamroot (<i>Balsamorhiza macrolepis</i>)	—/—/1B.2	Grassland	<u>Very Low:</u> Some grassland habitat exists in the project area. Nearest known occurrence is 4.5 miles SE of the project site near American Canyon.
Blasdale's bent grass (<i>Agrostis blasdalei</i>)	—/—/1B.2	Coastal grassland	<u>Very Low:</u> No coastal grassland habitat exists in the project area.
Blue coast gilia (<i>Gilia capitata</i> ssp. <i>chamissonis</i>)	—/—/1B.1	Coastal sand dunes	<u>None:</u> No sand dune habitat exists in the project area.

Taxon	Status ¹ Fed/State/CNPS	Habitat	Potential to Occur Within the Project Area
Bluff wallflower (<i>Erysimum concinnum</i>)	—/—/1B.2	Coastal scrub	<u>None</u> : No coastal scrub habitat exists in the project area.
Bogg's Lake hedge-hyssop (<i>Gratiola heterosepala</i>)	—/—/1B.2	Vernal pool, pond	<u>None</u> : No vernal pool habitat exists in the project area.
Bolander's horkelia (<i>Horkelia bolanderi</i>)	—/—/1B.2	Coniferous forest, grassland	<u>Very Low</u> : Some grassland exists in the project area.
Brandege's eriastrum (<i>Eriastrum brandegeae</i>)	—/—/1B.1	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Bristly sedge (<i>Carex comosa</i>)	—/—/2B.1	Wetland, riparian	<u>None</u> : No potential wetland habitat exists in the project area.
Brownish beaked-rush (<i>Rhynchospora capitellata</i>)	—/—/2B.2	Wetland, riparian	<u>None</u> : No potential wetland habitat exists in the project area.
Burke's goldfields (<i>Lasthenia burkei</i>)	FE/SE/1B.1	Vernal pools, grassland	<u>Very Low</u> : Some grassland habitat exists in the project area.
California alkali grass (<i>Puccinellia simplex</i>)	—/—/1B.2	Alkali grassland	<u>None</u> : No alkali grassland habitat exists in the project area.
California beaked-rush (<i>Rhynchospora californica</i>)	—/—/1B.1	Freshwater wetlands	<u>None</u> : No potential wetland habitat exists in the project area.
California satintail (<i>Imperata brevifolia</i>)	—/—/2B.1	Chaparral, coastal scrub	<u>None</u> : No chaparral habitat exists in the project area.
California sedge (<i>Carex californica</i>)	—/—/2B.3	Wetlands	<u>None</u> : No wetland habitat exists in the project area.
Calistoga ceanothus (<i>Ceanothus divergens</i>)	—/—/1B.2	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Calistoga popcornflower (<i>Plagiobothrys strictus</i>)	FE/ST/1B.1	Wetland, riparian	<u>None</u> : No wetland habitat exists in the project area.
Clara Hunt's milk vetch (<i>Astragalus claranus</i>)	—/—/1B.1	Chaparral, grassland	<u>Very Low</u> : Some grassland habitat exists in the project area.
Coast lily (<i>Lilium maritimum</i>)	—/—/1B.1	Coastal grassland	<u>Very Low</u> : Some grassland habitat exists in the project area.
Coastal bluff morning glory (<i>Calystegia purpurata</i> ssp. <i>saxicola</i>)	—/—/1B.2	Coastal grassland	<u>Very Low</u> : Some grassland habitat exists in the project area.

Taxon	Status ¹ Fed/State/CNPS	Habitat	Potential to Occur Within the Project Area
Cobb Mountain lupine (<i>Lupinus sericatus</i>)	—/—/1B.2	Chaparral, coniferous forest	<u>None</u> : No chaparral habitat exists in the project area.
Colusa layia (<i>Layia septentrionalis</i>)	—/—/1B.2	Chaparral, valley grassland	<u>Very Low</u> : Some grassland habitat exists in the project area.
Congested-headed hayfield tarplant (<i>Hemizonia congesta</i> ssp. <i>congesta</i>)	—/—/1B.2	Grassland, coastal scrub	<u>Low</u> : Some grassland habitat exists in the project area.
Contra Costa goldfields (<i>Lasthenia conjugens</i>)	FE/—/1B.1	Vernal pool	<u>Very Low</u>: No vernal pool habitat exists in the project area. Nearest known occurrence is 1.0 miles N of the project site near Soscol Creek Road.
Crystal Springs lessingia (<i>Lessingia arachnoidea</i>)	—/—/1B.2	Serpentine grassland	<u>None</u> : No serpentine grassland habitat exists in the project area.
Cunningham Marsh cinquefoil (<i>Potentilla uliginosa</i>)	—/—/1A	Wetland	<u>None</u> : No wetland habitat exists in the project area.
Dark-eyed gilia (<i>Gilia millefoliata</i>)	—/—/1B.2	Coastal sand dunes	<u>None</u> : No coastal sand dune habitat exists in the project area.
Deceiving sedge (<i>Carex saliniformis</i>)	—/—/1B.2	Grassland	<u>Very Low</u> : Some grassland habitat exists in the project area.
Deep-scarred cryptantha (<i>Cryptantha excavata</i>)	—/—/1B.2	Woodland	<u>None</u> : No woodland habitat exists in the project area.
Delta tule pea (<i>Lathyrus jepsonii</i> var. <i>jepsonii</i>)	—/—/1B.2	Freshwater and brackish marsh	<u>Very Low</u>: No marsh habitat exists in the project area. Nearest known occurrence is 0.8 miles W of the project site near Sheehy Creek.
Dimorphic snapdragon (<i>Antirrhinum subcordatum</i>)	—/—/4.3	Serpentine chaparral	<u>None</u> : No serpentine chaparral exists in the project area.
Dwarf downingia (<i>Downingia pusilla</i>)	—/—/2B.2	Vernal pool, wetland	<u>Very Low</u>: No vernal pool habitat exists in the project area. Nearest known occurrence is 0.3 miles N of the project site near Delvin Road.
Dwarf soaproot (<i>Chlorogalum pomeridianum</i> var. <i>minus</i>)	—/—/1B.2	Serpentine chaparral	<u>None</u> : No serpentine chaparral exists in the project area.
Eel-grass pondweed (<i>Potamogeton zosteriformis</i>)	—/—/2B.2	Wetland, pond	<u>None</u> : No wetland habitat exists in the project area.

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Fragrant fritillary (<i>Fritillaria liliacea</i>)	—/—/1B.2	Grassland	<u>Very Low</u> : Some grassland habitat exists in the project area.
Few-flowered navarretia (<i>Navarretia leucocephala</i> ssp. <i>pauciflora</i>)	FE/SE/1B.1	Vernal pool, wetland	<u>None</u> : No vernal pool habitat exists in the project area.
Franciscan onion (<i>Allium peninsulare</i> var. <i>franciscanum</i>)	—/—/1B.2	Coastal grassland	<u>Very Low</u>: Some grassland habitat exists in the project area. Nearest known occurrence is 5.2 miles NE of the project site near Carneros Creek.
Geysers panicum (<i>Panicum acuminatum</i> var. <i>thermale</i>)	—/—/1B.2	Chaparral, wetland	<u>None</u> : No chaparral habitat exists in the project area.
Glandular western flax (<i>Hesperolinon adenophyllum</i>)	—/—/1B.2	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Golden larkspur (<i>Delphinium luteum</i>)	FE/SR/1B.1	Coastal grassland	<u>Very Low</u> : No coastal grassland habitat exists in the project area.
Grassleaf water plantain (<i>Alisma gramineum</i>)	—/—/2B.2	Wetland, pond	<u>None</u> : No wetland habitat exists in the project area.
Greene's narrow-leaved daisy (<i>Erigeron greenei</i>)	—/—/1B.2	Serpentine chaparral	<u>None</u>: No serpentine chaparral habitat exists in the project area. Nearest known occurrence is 2.5 miles NE of the project site near Skyline Park.
Hall's harmonia (<i>Harmonia hallii</i>)	—/—/1B.2	Serpentine chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Hoffman's bristly jewelflower (<i>Streptanthus glandulosus</i> spp. <i>hoffmanii</i>)	—/—/1B.3	Chaparral, woodland	<u>None</u> : No chaparral habitat exists in the project area.
Holly-leaved ceanothus (<i>Ceanothus purpureus</i>)	—/—/1B.2	Chaparral	<u>None</u>: No chaparral habitat exists in the project area. Nearest known occurrence is 2.6 miles NE of the project site near Skyline Park.
Hospital Canyon larkspur (<i>Delphinium californicum</i> ssp. <i>interius</i>)	—/—/1B.2	Woodland	<u>None</u> : No woodland habitat exists in the project area.
Humboldt County milk vetch (<i>Astragalus agnicidus</i>)	—/—/1B.1	Coniferous forest	<u>None</u> : No coniferous forest habitat exists in the project area.
Jepson's coyote thistle (<i>Eryngium jepsonii</i>)	—/—/4.2	Wetland, vernal pool	<u>None</u> : No wetland habitat exists in the project area.

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Jepson's leptosiphon (<i>Leptosiphon jepsonii</i>)	—/—/1B.2	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Jepson's milk-vetch (<i>Astragalus rattanii</i> var. <i>jepsonianus</i>)	—/—/1B.2	Chaparral, grassland	<u>None</u> : No chaparral habitat exists in the project area.
Kenwood Marsh checkerbloom (<i>Sidalcea oregana</i> ssp. <i>valida</i>)	FE/SE/1B.1	Wetland	<u>None</u> : No wetland habitat exists in the project area.
Konocti manzanita (<i>Arctostaphylos manzanita</i> ssp. <i>elegans</i>)	—/—/1B.3	Chaparral, woodland	<u>None</u> : No chaparral habitat exists in the project area.
Lake County stonecrop (<i>Sedella leiocarpa</i>)	—/—/1B.1	Grassland, wetland	<u>None</u> : No wetland habitat exists in the project area.
Legenere (<i>Legenere limosa</i>)	—/—/1B.1	Wetland, grassland	<u>Very Low</u>: No potential wetland habitat exists in the project area. Nearest known occurrence is 0.9 miles N of the project site near Soscol Creek.
Loch Lomond button-celery (<i>Eryngium constancei</i>)	FE/SE/1B.1	Vernal pool	<u>None</u> : No vernal pool habitat exists in the project area.
Long-styled sand-spurrey (<i>Spergularia macrotheca</i> var. <i>longistyla</i>)	—/—/1B.2	Wetland, grassland	<u>None</u> : No potential wetland habitat exists in the project area.
Lyngbye's sedge (<i>Carex lyngbyei</i>)	—/—/2B.2	Salt marsh	<u>None</u>: No salt marsh habitat exists in the project area. Nearest known occurrence is 2.2 miles SW of the project site near the community of Brazos.
Many-flowered navarretia (<i>Navarretia leucocephala</i> spp. <i>pliantha</i>)	FE/SE/1B.2	Vernal pool	<u>None</u> : No wetland habitat exists in the project area.
Maple-leaved checkerbloom (<i>Sidalcea malachroides</i>)	—/—/4.2	Coastal grassland, coniferous forest	<u>Very Low</u> : Some grassland habitat exists in the project area.
Marin checker lily (<i>Fritillaria lanceolata</i> var. <i>tristulis</i>)	—/—/1B.1	Grassland	<u>Very Low</u> : Some grassland habitat exists in the project area.
Marin checkerbloom (<i>Sidalcea hickmanii</i> spp. <i>viridis</i>)	—/—/1B.2	Grassland	<u>Very Low</u> : Some grassland habitat exists in the project area.
Marin County navarretia (<i>Navarretia rosulata</i>)	—/—/1B.2	Serpentine forest	<u>None</u> : No serpentine habitat exists in the project area.
Marin knotweed (<i>Polygonum marinense</i>)	—/—/3.1	Coastal salt marsh	<u>None</u>: No coastal salt marsh habitat exists in the project area. Nearest

Taxon	Status ¹ Fed/State/CNPS	Habitat	Potential to Occur Within the Project Area
			known occurrence is 0.8 miles SW of the project site near Fagan Marsh.
Marin manzanita (<i>Arctostaphylos virgata</i>)	—/—/1B.2	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Marin western flax (<i>Hesperolinon congestum</i>)	FT/ST/1B.1	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Marsh checkerbloom (<i>Sidalcea oregana</i> ssp. <i>hydrophila</i>)	—/—/1B.2	Wetland, riparian	<u>None</u> : No wetland habitat exists in the project area.
Marsh microseris (<i>Microseris paludosa</i>)	—/—/1B.2	Wetland, grassland	<u>None</u> : No wetland habitat exists in the project area.
Marsh pea (<i>Lathyrus palustris</i>)	—/—/2B.1	Coastal grassland	<u>Very Low</u> : No coastal grassland habitat exists in the project area.
Mason's ceanothus (<i>Ceanothus masonii</i>)	—/SR/1B.2	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Mason's lilaeopsis (<i>Lilaeopsis masonii</i>)	—/SR/1B.1	Freshwater and brackish marsh	<u>None</u>: No marsh habitat exists in the project area. Nearest known occurrence is 0.8 miles W of the project site near the Napa River.
Milo Baker's lupine (<i>Lupinus milo-bakeri</i>)	—/—/1B.1	Woodland, grassland	<u>None</u> : No woodland habitat exists in the project area.
Morrison's jewelflower (<i>Streptanthus morrisonii</i> ssp. <i>morrisonii</i>)	—/—/1B.2	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Mt. St. Helena morning glory (<i>Calystegia collina</i> ssp. <i>oxyphylla</i>)	—/—/4.2	Serpentine chaparral	<u>None</u> : No serpentine habitat exists in the project area.
Mt. Tamalpais bristly jewelflower (<i>Streptanthus glandulosus</i> ssp. <i>pulchellus</i>)	—/—/1B.2	Chaparral, grassland	<u>None</u> : No chaparral habitat exists in the project area.
Mt. Tamalpais manzanita (<i>Arctostaphylos montana</i> ssp. <i>montana</i>)	—/—/1B.3	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Mt. Tamalpais thistle (<i>Cirsium hydrophilum</i> var. <i>vaseyi</i>)	—/—/1B.2	Grassland	<u>Very Low</u> : Some grassland habitat exists in the project area.
Napa blue grass (<i>Poa napensis</i>)	FE/SE/1B.1	Wetland, grassland	<u>Very Low</u> : Some grassland habitat exists in the project area.
Napa checkerbloom (<i>Sidalcea hickmanii</i> ssp. <i>napensis</i>)	—/—/1B.1	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.

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Napa false indigo (<i>Amorpha californica</i> var. <i>napensis</i>)	—/—/1B.2	Forest, woodland	<u>None</u> : No woodland habitat exists in the project area.
Narrow-anthered brodiaea (<i>Brodiaea leptandra</i>)	—/—/1B.2	Woodland, grassland	<u>Very Low</u> : Some grassland habitat exists in the project area. Nearest known occurrence is 2.5 miles NE of the project site near Skyline Park.
North Coast semaphore grass (<i>Pleuropogon hooverianus</i>)	—/—/1B.1	Wetland, vernal pool	<u>None</u> : No wetland habitat exists in the project area.
Nuttall's ribbon-leaved pondweed (<i>Potamogeton epihydrus</i>)	—/—/2B.2	Pond	<u>None</u> : No pond habitat exists in the project area.
Oval-leaved viburnum (<i>Viburnum ellipticum</i>)	—/—/2B.3	Chaparral	<u>None</u> : No chaparral habitat exists in the project area. Nearest known occurrence is 2.5 miles NE of the project site near Skyline Park.
Pacific gilia (<i>Gilia capitata</i> ssp. <i>pacifica</i>)	—/—/1B.2	Coastal grassland	<u>Very Low</u> : No coastal grassland habitat exists in the project area.
Pacific Grove clover (<i>Trifolium polyodon</i>)	—/—/1B.1	Grassland, wetland	<u>None</u> : No wetland habitat exists in the project area.
Pappose tarplant (<i>Centromadia parryi</i> ssp. <i>parryi</i>)	—/—/1B.2	Grassland, wetland	<u>None</u> : No wetland habitat exists in the project area.
Pennell's bird's beak (<i>Cordylanthus tenuis</i> ssp. <i>capillaris</i>)	FE/SR/1B.2	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Perennial goldfields (<i>Lasthenia californica</i> ssp. <i>macrantha</i>)	—/—/1B.2	Coastal scrub	<u>None</u> : No coastal scrub habitat exists in the project area.
Peruvian dodder (<i>Cuscuta obtusiflora</i> var. <i>glandulosa</i>)	—/—/1B.2	Parasitic plant, grassland, chaparral	<u>Very Low</u> : Some grassland habitat exists in the project area.
Petaluma popcornflower (<i>Plagiobothrys mollis</i> var. <i>vestitus</i>)	—/—/1A	Coastal salt marsh	<u>None</u> : No coastal salt marsh habitat exists in the project area.
Pink sand verbena (<i>Abronia umbellata</i> var. <i>breviflora</i>)	—/—/1B.1	Coastal sand dune	<u>None</u> : No sand dune habitat exists in the project area.
Pitkin Marsh lily (<i>Lilium pardalinum</i> ssp. <i>pitkinense</i>)	FE/SE/1B.1	Wetland	<u>None</u> : No wetland habitat exists in the project area.

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Pitkin Marsh paintbrush (<i>Castilleja uliginosa</i>)	FE/SE/1A	Wetland	<u>None</u> : No wetland habitat exists in the project area.
Point Reyes checkerbloom (<i>Sidalcea calycosa</i> ssp. <i>rhizomata</i>)	—/—/1B.2	Coastal salt marsh	<u>None</u> : No salt marsh habitat exists in the project area.
Point Reyes salty bird's beak (<i>Chloropyron maritimum</i> ssp. <i>palustre</i>)	—/—/1B.2	Coastal salt marsh	<u>None</u> : No salt marsh habitat exists in the project area.
Purple-stemmed checkerbloom (<i>Sidalcea malviflora</i> ssp. <i>purpurea</i>)	—/—/1B.2	Wetland	<u>None</u> : No wetland habitat exists in the project area.
Pygmy cypress (<i>Hesperocyparis pygmaea</i>)	—/—/1B.2	Hardpan soil	<u>None</u> : No hardpan forest habitat exists in the project area.
Raiche's manzanita (<i>Arctostaphylos stanfordiana</i> ssp. <i>raichei</i>)	—/—/1B.1	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Raiche's red ribbons (<i>Clarkia concinna</i> ssp. <i>raichei</i>)	—/—/1B.1	Coastal scrub	<u>Very Low</u> : No coastal scrub habitat exists in the project area.
Rincon Ridge ceanothus (<i>Ceanothus confusus</i>)	—/—/1B.1	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Rincon Ridge manzanita (<i>Arctostaphylos stanfordiana</i> ssp. <i>decumbens</i>)	—/—/1B.1	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Rose leptosiphon (<i>Leptosiphon rosaceus</i>)	—/—/1B.1	Coastal scrub	<u>None</u> : No coastal scrub habitat exists in the project area.
Round-headed beaked rush (<i>Rhynchospora globularis</i>)	—/—/2B.1	Wetland, riparian	<u>None</u> : No 1 wetland habitat exists in the project area.
Round-headed Chinese houses (<i>Collinsia corymbosa</i>)	—/—/1B.2	Coastal strand	<u>None</u> : No coastal strand habitat exists in the project area.
Round-leaved filaree (<i>California macrophylla</i>)	—/—/1B.2	Foothill grassland	<u>Very Low</u> : Some grassland habitat exists in the project area.
Saline clover (<i>Trifolium hydrophilum</i>)	—/—/1B.2	Wetland, riparian	<u>Very Low</u>: No potential wetland habitat exists in the project area. Nearest known occurrence is 0.9 miles N of the project site near Soscol Creek.
San Francisco spineflower (<i>Chorizanthe cuspidata</i> var. <i>cuspidata</i>)	—/—/1B.2	Coastal sand dunes	<u>None</u> : No coastal sand dune habitat exists in the project area.

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San Joaquin spearscale (<i>Extriplex joaquinana</i>)	—/—/1B.2	Alkali scrub, grassland	Very Low: No alkali scrub habitat exists in the project area. Nearest known occurrence is 3.2 miles N of the project site near Kennedy Park.
Santa Cruz clover (<i>Trifolium buckwestiorum</i>)	—/—/1B.1	Wetland, grassland	<u>Very Low:</u> Some grassland habitat exists in the project area.
Santa Cruz microseris (<i>Stebbinsoseris decipiens</i>)	—/—/1B.2	Coastal scrub	<u>None:</u> No coastal scrub habitat exists in the project area.
Santa Cruz tarplant (<i>Holocarpha macradenia</i>)	FT/SE/1B.1	Coastal prairie	<u>None:</u> No coastal prairie habitat exists in the project area.
Santa Rosa horkelia (<i>Horkelia tenuiloba</i>)	—/—/1B.2	Chaparral	<u>None:</u> No chaparral habitat exists in the project area.
Seaside bittercress (<i>Cardamine angulata</i>)	—/—/2B.2	Forest, riparian	<u>None:</u> No forest habitat exists in the project area.
Sebastopol meadowfoam (<i>Limnanthes vinculans</i>)	FE/SE/1B.1	Wetland, vernal pool	<u>None:</u> No wetland habitat exists in the project area.
Serpentine cryptantha (<i>Cryptantha dissita</i>)	—/—/1B.2	Serpentine chaparral	<u>None:</u> No chaparral habitat exists in the project area.
Serpentine daisy (<i>Erigeron serpentinus</i>)	—/—/1B.3	Serpentine chaparral	<u>None:</u> No serpentine chaparral exists in the project area.
Short-leaved evax (<i>Hesperivax sparsiflora</i> var. <i>brevifolia</i>)	—/—/1B.2	Coastal grassland	<u>Very Low:</u> No coastal grassland habitat exists in the project area.
Slender Orcutt grass (<i>Orcuttia tenuis</i>)	FT/SE/1B.1	Vernal pool	<u>None:</u> No vernal pool habitat exists in the project area.
Small-flowered calycadenia (<i>Calycadenia micrantha</i>)	—/—/1B.2	Chaparral	<u>None:</u> No chaparral habitat exists in the project area.
Small groundcone (<i>Kopsiopsis hookeri</i>)	—/—/2B.3	Redwood forest	<u>None:</u> No redwood forest habitat exists in the project area.
Soft salty bird's beak (<i>Chloropyron molle</i> ssp. <i>molle</i>)	FE/ST/1B.2	Coastal salt marsh	<u>None:</u> No salt marsh habitat exists in the project area. Nearest known occurrence is 0.8 miles SW of the project site near Fagan Marsh.
Sonoma alopecurus (<i>Alopecurus aequalis</i> var. <i>sonomensis</i>)	FE/—/1B.1	Wetland, vernal pool	<u>None:</u> No wetland habitat exists in the project area.

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Sonoma beardtongue (<i>Penstemon newberryi</i> var. <i>sonomensis</i>)	—/—/1B.3	Chaparral	<u>Very Low</u> : Some grassland habitat exists in the project area.
Sonoma ceanothus (<i>Ceanothus sonomensis</i>)	—/—/1B.2	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Sonoma spineflower (<i>Chorizanthe valida</i>)	FE/SE/1B.1	Coastal grassland	<u>Very Low</u> : Some grassland habitat exists in the project area.
Sonoma sunshine (<i>Blennosperma bakeri</i>)	FE/SE/1B.1	Grassland, wetland	<u>Very Low</u> : Some grassland habitat exists in the project area.
Suisun marsh aster (<i>Symphotrichum lentum</i>)	—/—/1B.2	Freshwater and brackish marsh	<u>None</u> : No marsh habitat exists in the project area. Nearest known occurrence is 0.8 miles SW of the project site near Fagan Marsh.
Supple daisy (<i>Erigeron supplex</i>)	—/—/1B.2	Coastal scrub	<u>None</u> : No coastal scrub habitat exists in the project area.
Swamp harebell (<i>Campanula californica</i>)	—/—/1B.2	Coastal grassland, wetland	<u>None</u> : No wetland habitat exists in the project area.
Tamalpais jewelflower (<i>Streptanthus batrachopus</i>)	—/—/1B.3	Serpentine	<u>None</u> : No serpentine habitat exists in the project area.
Tamalpais lessingia (<i>Lessingia micradenia</i> var. <i>micradenia</i>)	—/—/1B.2	Grassland	<u>Very Low</u> : Some grassland habitat exists in the project area.
Tamalpais oak (<i>Quercus parvula</i> var. <i>tamalpaisensis</i>)	—/—/1B.3	Woodland	<u>None</u> : No woodland habitat exists in the project area.
The Cedars fairy lantern (<i>Calochortus raichei</i>)	—/—/1B.2	Hardpan chaparral	<u>None</u> : No chaparral habitat exists in the project area.
The Cedars manzanita (<i>Arctostaphylos bakeri</i> ssp. <i>sublaevis</i>)	—/—/1B.2	Hardpan chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Thin-lobed horkelia (<i>Horkelia tenuiloba</i>)	—/—/1B.2	Chaparral	<u>None</u> : No chaparral habitat exists in the project area.
Thurber's reed grass (<i>Calamagrostis crassiglumis</i>)	—/—/2B.1	Coastal scrub, wetland	<u>None</u> : No wetland habitat exists in the project area.
Tiburon buckwheat (<i>Eriogonum luteolum</i> var. <i>caninum</i>)	—/—/1B.2	Serpentine grassland	<u>None</u> : No serpentine grassland exists in the project area.

Taxon	Status ¹ Fed/State/CNPS	Habitat	Potential to Occur Within the Project Area
Tiburon paintbrush (<i>Castilleja affinis</i> var. <i>neglecta</i>)	FE/ST/1B.2	Serpentine grassland	Very Low: No serpentine grassland exists in the project area. Nearest known occurrence is 4.5 miles SE of the project site near American Canyon.
Two-carpellate western flax (<i>Hesperolinon bicarpellatum</i>)	—/—/1B.2	Serpentine chaparral	<u>None:</u> No serpentine chaparral exists in the project area.
Two-fork clover (<i>Trifolium amoenum</i>)	FE/—/1B.1	Grassland, wetland	Very Low: Some grassland habitat exists in the project area. Nearest known occurrence is 2.5 miles W of the project site near Milton Road.
Vine Hill ceanothus (<i>Ceanothus foliosus</i> var. <i>vineatus</i>)	—/—/1B.1	Chaparral	<u>None:</u> No chaparral habitat exists in the project area.
Vine Hill clarkia (<i>Clarkia imbricata</i>)	FE/SE/1B.1	Chaparral, grassland	<u>None:</u> No chaparral habitat exists in the project area.
Vine Hill manzanita (<i>Arctostaphylos densiflora</i>)	—/SE/1B.1	Chaparral	<u>None:</u> No chaparral habitat exists in the project area.
Watershield (<i>Brasenia schreberi</i>)	—/—/2B.3	Pond	<u>None:</u> No pond habitat exists in the project area.
Western leatherwood (<i>Dirca occidentalis</i>)	—/—/1B.2	Woodland, chaparral	<u>None:</u> No woodland habitat exists in the project area.
White-beaked rush (<i>Rhynchospora alba</i>)	—/—/2B.2	Wetland, riparian	<u>None:</u> No wetland habitat exists in the project area.
White-flowered rein orchid (<i>Piperia candida</i>)	—/—/1B.2	Coniferous forest	<u>None:</u> No coniferous forest habitat exists in the project area.
White-rayed pentachaeta (<i>Pentachaeta bellidiflora</i>)	FE/SE/1B.1	Grassland	Very Low: Some grassland habitat exists in the project area.
Wolly-headed gilia (<i>Gilia capitata</i> ssp. <i>tomentosa</i>)	—/—/1B.1	Coastal grassland	Very Low: No coastal grassland habitat exists in the project area.
Wolly meadowfoam (<i>Limnanthes floccosa</i> ssp. <i>floccosa</i>)	—/—/4.2	Vernal pool	<u>None:</u> No wetland habitat exists in the project area.
Wolly spineflower (<i>Chorizanthe cuspidata</i> var. <i>villosa</i>)	—/—/1B.2	Coastal sand dunes	<u>None:</u> No sand dune habitat exists in the project area.

Taxon	Status ¹ Fed/State/CNPS	Habitat	Potential to Occur Within the Project Area
MOSSES, LICHENS & LIVERWORTS			
Angel's hair lichen (<i>Ramalina thrausta</i>)	—/—/2B.1	Forest, woodland	<u>None</u> : No forest habitat exists in the project area.
Coastal triquetrella (<i>Triquetrella californica</i>)	—/—/1B.2	Forest, woodland	<u>None</u> : No forest habitat exists in the project area.
Elongate copper moss (<i>Mielichhoferia elongata</i>)	—/—/4.3	Rock outcrops	<u>None</u> : No rock outcrop habitat exists in the project area.
Koch's cord moss (<i>Entosthodon kochii</i>)	—/—/1B.3	Forest, woodland	<u>None</u> : No forest habitat exists in the project area.
Methuselah's beard lichen (<i>Dolichousnea longissima</i>)	—/—/4.2	Forest, woodland	<u>None</u> : No forest habitat exists in the project area.
Slender silver moss (<i>Anomobryum julaceum</i>)	—/—/4.2	Rocky substrates in forests	<u>None</u> : No forest habitat exists in the project area.
Torren's grimmia (<i>Grimmia torenii</i>)	—/—/1B.3	Forest, woodland	<u>None</u> : No forest habitat exists in the project area.
HABITATS			
Coastal & Valley Freshwater Marsh (CVFM)	—	—	<u>None</u> : No marsh habitat exists in the project area.
Coastal Brackish Marsh (CVFM)	—	—	<u>None</u> : No brackish marshes exist in the project area.
Northern Coastal Salt Marsh (NCSM)	—	—	<u>None</u> : No salt marsh habitat exists in the project area.
Northern Hardpan Vernal Pool (NHVP)	—	—	<u>None</u> : No hardpan vernal pool habitat exists in the project area.
Northern Vernal Pool (NVP)	—	—	<u>None</u> : No vernal pool habitat exists in the project area.
Sycamore Alluvial Woodland (SAW)	—	—	<u>None</u> : No woodland habitat exists in the project area.
Valley Needlegrass Grassland (VNG)	—	—	<u>Very Low</u> : Some disturbed grassland habitat exists in the project area.

Taxon	Status ¹ Fed/State/CNPS	Habitat	Potential to Occur Within the Project Area
Valley Oak Woodland (VOW)	—	—	<u>None</u> : No valley oaks exist in the project area.
Valley Sink Scrub (VSS)	—	—	<u>None</u> : No sink habitat exists in the project area.

¹ Status:

Federal

FE = Federally Endangered Species

FT = Federally Threatened Species

State

SE = State Endangered Species

ST = State Threatened Species

SSC = California Species of Special Concern

CFP = California Fully Protected Species

CNPS (applies to plants only)

List 1B = plants considered rare, threatened, or endangered in California and elsewhere

List 2B = plants rare, threatened or endangered in California, but more common elsewhere

List 3 = plant is likely rare but more information is required

List 4 = plants of limited distribution

Appendix B: Plant Species Observed Onsite

The following is a list of plant species directly observed onsite during the above-referenced plant surveys. No special-status species were observed onsite.

Non-native

bird's foot trefoil (*Lotus corniculatus*)
 black mustard (*Brassica nigra*),
 bristly ox-tongue (*Helminthotheca echinoides*)
 bull thistle (*Cirsium vulgare*)
 bur clover (*Medicago polymorpha*)
 chicory (*Cichorium intybus*)
 common dandelion (*Taraxacum officinale*)
 common groundsel (*Senecio vulgaris*)
 crane's bill filaree (*Erodium botrys*)
 curly dock (*Rumex crispus*)
 fennel (*Foeniculum vulgare*)
 field bindweed (*Convolvulus arvensis*)
 foxtail barley (*Hordeum murinum*)
 Fuller's teasel (*Dipsacus fullonum*)
 hairgrass (*Aira caryophylla*)
 hairy vetch (*Vicia villosa*)
 Harding grass (*Phalaris aquatica*)
 hedge parsley (*Torilis arvensis*)
 Italian ryegrass (*Festuca perennis*)
 Italian thistle (*Cirsium pycnocephalus*)
 Jersey cudweed (*Pseudognaphalium luteoalbum*)
 narrowleaf cottonrose (*Logfia gallica*)
 pineapple weed (*Matricaria discoidea*)
 poison hemlock (*Conium maculatum*)
 prickly lettuce (*Lactuca serriola*)
 reed fescue (*Festuca arundinacea*)
 ribwort (*Plantago lanceolata*)
 ripgut brome (*Bromus diandrus*)
 rose clover (*Trifolium hirtum*)
 salsify (*Tragopogon porrifolius*)
 scarlet pimpernel (*Lysimachia arvensis*)
 sheep sorrel (*Rumex acetocella*)
 shortpod mustard (*Hirschfeldia incana*)
 smooth cat's ear (*Hypochaeris glabra*)
 soft chess (*Bromus hordeaceus*)
 spring vetch (*Vicia sativa*)
 strawberry clover (*Trifolium fragiferum*)
 sweet pea (*Lathyrus latifolius*)
 weedy brome (*Bromus caroli-henrici*)
 wild geranium (*Geranium dissectum*)
 wild lettuce (*Lactuca saligna*)
 wild oatgrass (*Avena barbata*)

wild radish (*Raphanus sativa*)
yellow star thistle (*Centaurea solstitialis*)
Zorro fescue (*Festuca myuros*)

Native

California poppy (*Eschscholzia californica*)
common yarrow (*Achillea millefolium*)
coyote brush (*Baccharis pilularis*)
hairy gumweed (*Grindelia hirsutula*)
ladies' tobacco (*Pseudognaphalium californicum*)
meadow barley (*Hordeum brachyantherum*)
mountain dandelion (*Agoseris heterophylla*)
saltgrass (*Distichlis spicata*)
slender tarweed (*Madia gracilis*)

Attachment A:

Comment Letters–State Agencies



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 Bay Delta Region
 2825 Cordelia Road
 Fairfield, CA 94534
 (707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

CDFW
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November 15, 2024

Sean Trippi, Supervising Planner
 Napa County Planning, Building, and Environmental Services
 1195 Third Street, Suite 210
 Napa, CA 94559
Sean.Trippi@countyofnapa.org

Subject: E&P Technology Way - Building A & B Use Permit #'s P22-00307-UP and P22-00308-UP (APN's: 057-250-030, -031, -032), Initial Study/Mitigated Negative Declaration, SCH No. 2024100855, Napa County

Dear Mr. Trippi:

The California Department of Fish and Wildlife (CDFW) received an Initial Study/Mitigated Negative Declaration (IS/MND) from Napa County (County) for the E&P Technology Way - Building A & B Use Permit #'s P22-00307-UP and P22-00308-UP (APN's: 057-250-030, -031, -032) (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.

1

CDFW is submitting comments on the IS/MND to inform the County, as the Lead Agency, of potentially significant impacts to biological resources associated with the Project.

CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under CEQA pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), the Lake and Streambed Alteration (LSA) Agreement, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

2

PROJECT DESCRIPTION SUMMARY

Proponent: Mike Kelly

Objective: The Project is limited to the development of a 143,312 square-foot wine production facility (Building A) and a 66,915 square-foot warehouse (Building B). The winery uses will include grape crushing, bulk wine processing and storage, stainless steel tank and barrel storage, bottling, and office space. In addition, approximately 13,000 square feet of covered outdoor work area will be located on the north side of the

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building. The Project also includes 129 parking spaces and 8 spaces for semi-trailers. Access will be provided by three new driveways: one on Technology Way and two on Morris Court.

Building B is limited to warehouse uses within the proposed 66,915 square-foot building. All vehicles will enter from a new access driveway on Technology Way that runs along the eastern property line. Trucks will be able to circulate around the building in a one-way loop, exiting at a second driveway on Technology Way on the west side of the building. The entrance driveway will be wide enough to accommodate two-way traffic.

Location: The Project is located on three parcels comprising two sites: Building A is proposed on a 13.2-acre parcel on the north side of Technology Way and Morris Court (APN 057-250-030), at approximately 38.22753°N and -122.26939°W; and Building B is proposed on a 6.87-acre site on the north side of Technology Way, opposite Gateway Road West (APN's 057-250-031, -032, to be combined), at approximately 38.22677°N, -122.26638°W. A conservation easement runs along the north and northeast boundary of the Project site which includes a meandering path along the south side of Sheehy Creek.

REGULATORY REQUIREMENT

California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in "take" of plants or animals listed or candidate species under CESA either during construction or over the life of the Project. **The Project has the potential to impact Swainson's hawk (*Buteo swainsoni*), CESA listed as threatened species. Thank you for including mitigation measures for Swainson's hawk. Please be advised that the California Natural Diversity Database (CNDDB) documents a nesting Swainson's hawk record in year 2021 approximately 300 feet north of the Project site. Swainson's hawks often utilize the same nests sites from year to year, therefore there is a high potential for nesting Swainson's hawk to be impacted by the Project during nesting season, warranting an ITP. The Project also has the potential to impact burrowing owl (*Athene cunicularia*), a CESA candidate species, as further described below.** Issuance of an ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain an ITP.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub.

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Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 15065.). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency’s FOC does not eliminate the Project proponent’s obligation to comply with CESA.

4
CONT

Raptors and Other Nesting Birds

CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

5

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the Project’s avoidance of significant impacts on biological resources with implementation of mitigation measures, including those CDFW recommends below and included in **Attachment 1** Draft Mitigation Monitoring and Reporting Program, CDFW concludes that an MND is appropriate for the Project.

6

I. Mitigation Measure and Related Impact Shortcoming

MANDATORY FINDING OF SIGNIFICANCE. Does the Project have potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

COMMENT 1: Burrowing Owl

Issue: Thank you for including in the IS/MND mitigation measures for burrowing owl (BUOW). However, the language in the IS/MND and the Biological Resources Analysis does not reflect the recent status change of BUOW to a CESA candidate species, and Mitigation Measure (MM) BIO-6 does not stipulate whether the Project would obtain a CESA ITP if take of BUOW may occur. Take of CESA candidate species is prohibited without a CESA take authorization from CDFW, typically an ITP. CNDDDB documents a wintering BUOW record approximately 1,100 feet northeast of the Project site, within the area of potential Project disturbance.

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Recommended mitigation measure: To reduce potential impacts to BUOW to less-than-significant and comply with CESA, CDFW recommends adding the following requirements to MM BIO-6.

Mitigation Measure BIO-6 (Burrowing Owl Habitat Assessment and Surveys): If take of burrowing owl (BUOW) cannot be avoided, the Project shall consult with CDFW pursuant to CESA and obtain an ITP before Project activities commence. Take is likely to occur and the Project shall obtain an ITP if: 1) BUOW surveys of the Project site detect BUOW occupancy of burrows or burrow surrogates, or 2) there is sign of BUOW occupancy on the Project site within the past three years and habitat has not had any substantial change that would make it no longer suitable within the past three years. Occupancy means a site that is assumed occupied if at least one BUOW has been observed occupying a burrow or burrow surrogate within the last three years. Occupancy of suitable BUOW habitat may also be indicated by BUOW sign including its molted feathers, cast pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance or perch site. If BUOW, or their burrows or burrow surrogates, are detected within 500 meters (1,640 feet) of the Project site during BUOW surveys, but not on the Project site, the Project shall consult with CDFW to determine if avoidance is feasible, or an ITP is warranted and shall obtain an ITP if deemed necessary by CDFW.

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CONT

II. Editorial Comment

COMMENT 2: California Endangered Species Act Incidental Take Permit

Issue: The IS/MND Page 2, Section 10 states: "The proposed project does not involve the "take" of listed endangered or threatened species, and thus does not require a "take permit" from the Department of Fish and Wildlife..." As discussed above, the Project has the potential to result in take of BUOW and Swainson's hawk. Furthermore, the IS/MND MM BIO-4 states: "If take of Swainson's hawk cannot be avoided, the Project shall consult with CDFW pursuant to CESA and obtain an ITP before Project activities may commence. Therefore, the Project may require a "take permit" (i.e., ITP) from CDFW.

8

Recommendation: CDFW recommends revising the above language on IS/MND Page 2, Section 10 to: "The proposed project has the potential to result in "take" of listed endangered or threatened species, or candidate species for listing, and thus may require a "take permit" from the Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, or the National Marine Fisheries Service.

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ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form can be filled out and submitted online at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:

<https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>

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ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

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CONCLUSION

CDFW appreciates the opportunity to comment on the IS/MND to assist the County in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Nicholas Magnuson, Environmental Scientist, at (707) 815-4166 or Nicholas.Magnuson@wildlife.ca.gov, or Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or Melanie.Day@wildlife.ca.gov.

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Sincerely,

DocuSigned by:

Erin Chappell

B77E9A6211EF486

Erin Chappell

Regional Manager
Bay Delta Region

Attachment 1: Draft Mitigation Monitoring and Reporting Program

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2024100855)
Sean Kennings, LAK Associates, LLC - Sean@lakassociates.com

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Napa County Planning, Building, and Environmental Services
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ATTACHMENT

Draft Mitigation Monitoring and Reporting Program (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Biological Resources (BIO)			
Mitigation Measure (MM)	Description	Timing	Responsible Party
MM BIO-6	<u>ADD THE BELOW LANGUAGE TO THE EXISTING MM BIO-6.</u> <u>Burrowing Owl Habitat Assessment and Surveys:</u> If take of BUOW cannot be avoided, the Project shall consult with CDFW pursuant to CESA and obtain an ITP before Project activities commence. Take is likely to occur, and the Project shall obtain an ITP if: 1) BUOW surveys of the Project site detect BUOW occupancy of burrows or burrow surrogates, or 2) there is sign of BUOW occupancy on the Project site within the past three years and habitat has not had any substantial change that would make it no longer suitable within the past three years. Occupancy means a site that is assumed occupied if at least one BUOW has been observed occupying a burrow or burrow surrogate within the last three years. Occupancy of suitable BUOW habitat may also be indicated by BUOW sign including its molted feathers, cast pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance or perch site. If BUOW, or their burrows or burrow surrogates, are detected within 500 meters (1,640 feet) of the Project site during BUOW surveys, but not on the Project site, the Project shall consult with CDFW to determine if avoidance is feasible, or an ITP is warranted and shall obtain an ITP if deemed necessary by CDFW.	Prior to Ground Disturbance and During Project Construction	Project Applicant
Editorial Comment	CDFW recommends revising the language on IS/MND Page 2, Section 10 to: "The proposed project has the potential to result in "take" of listed endangered or threatened species, or candidate species for listing, and thus may require a "take permit" from the Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, or the National Marine Fisheries Service.	Prior to Finalizing IS/MND	Lead Agency

Attachment B:

Comment Letters—Organizations

November 14, 2024

Via Email and Overnight Mail

Brian D. Bordona, Director
County of Napa
Planning, Building, & Environmental Services Department
1195 Third Street, Suite 210
Napa, CA 94559
Email: Brian.bordona@countyofnapa.org

Via Email Only

Sean Trippi, Supervising Planner, Sean.trippi@countyofnapa.org

**Re: Request to Extend the Public Review and Comment Period for
the Initial Study/Mitigated Negative Declaration for the E&P
Technology Way - Buildings A & B (Use Permits #P22-00307 and #P22-
00308) (SCH: 2024100855)**

Dear Director Bordona and Mr. Trippi:

On behalf of Napa-Solano Residents for Responsible Development (“Napa-Solano Residents”), we respectfully request that the County of Napa (“County”) extend the public review and comment period for the Initial Study/Mitigated Negative Declaration (collectively, “MND”)¹ prepared pursuant to the California Environmental Quality Act (“CEQA”)² for the E&P Technology Way - Buildings A and B (Use Permits #P22-00307 and #P22-00308) (SCH: 2024100855) (“Project”), proposed by Michael Kelley (“Applicant”), **by at least thirty (30) days due to the County’s failure to provide timely access to the supporting documents for the MND.**

The Project proposes to construct two separate buildings on three parcels comprising two sites: Building A is proposed on a 13.2-acre parcel on the north side of Technology Way and Morris Court (APN 057-250-030) and Building B is proposed

¹ Napa County, *Initial Study/Mitigated Negative Declaration for E&P Technology Way - Buildings A & B (Use Permits #P22-00307 and #P22-00308)* (October 2024), available at: <https://ceqanet.opr.ca.gov/2024100855> (hereinafter “MND”).

² Pub. Res. Code § 21000 *et seq.*; 14 C.C.R. §§ 15000, *et seq.*

on a 6.87-acre project site on the north side of Technology Way, opposite Gateway Road West (APN's 057-250-031, -032), which will be combined.³ Building A is a 143,312 square foot ("SF") refrigerated wine production facility with an annual production capacity of 450,000 gallons.⁴ Building B is a proposed 66,915 SF building for warehouse uses.⁵

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CONT

On November 7, 2024, we submitted a letter to the County pursuant to CEQA requesting "***immediate access*** to any and all documents referenced or relied upon" in the MND ("MND reference document request").⁶ CEQA requires that "all documents referenced in the draft environmental impact report or negative declaration" be available for review and "readily accessible" during the entire comment period.⁷ On November 7, 2024, we also submitted a letter to the County pursuant to the California Public Records Act (Government Code §§ 7920.000, *et seq.*) ("PRA") as well as Article I, section 3(b) of the California Constitution⁸ to request "***immediate access***⁹ to any and all public records in the County's possession referring or related" to the Project ("PRA request").¹⁰ The requests were sent separately to avoid confusion as to what documents and records were sought.

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The County's NextRequest system sent an autoreply to acknowledge receipt of the PRA request on November 7, 2024 and sent an autoreply to acknowledge

³ Napa County, *Staff Report for the E&P Technology Way - Buildings A & B (Use Permits #P22-00307 and #P22-00308) Project* at p. 2 (November 8, 2024).

⁴ MND at p. 1.

⁵ *Id.* at p. 2.

⁶ Letter to Request Immediate Access to Documents Referenced in the MND from Jeanne Grube, Adams Broadwell Joseph & Cardozo ("ABJC"), to Brian D. Bordona, Director of County of Napa Planning, Building, and Environmental Services Department, Neha Hoskins, Clerk of the Board of Supervisors, and Sean Trippi, Supervising Planner, (November 7, 2024) ("Exhibit A").

⁷ Pub. Res. Code § 21092(b)(1) (stating that "all documents referenced in the draft environmental impact report or negative declaration" shall be made "available for review"); *see also* 14 C.C.R. § 15072(g)(4) (stating that all documents incorporated by reference in the MND . . . "shall be readily accessible to the public").

⁸ Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

⁹ Gov't Code § 7922.525(a).

¹⁰ Letter to Request Immediate Access to Public Records from Jeanne Grube, ABJC, to Brian D. Bordona, Director of County of Napa Planning, Building, and Environmental Services Department, Neha Hoskins, Clerk of the Board of Supervisors, and Sean Trippi, Supervising Planner, (November 7, 2024) ("Exhibit B").

receipt of the MND reference document request on November 8.¹¹ On November 13, 2024, our office contacted the County via email to ask when records would be provided to each request.¹² The County responded that same day that a response would be provided on November 18, which is the day before the MND comment period deadline.¹³ No responsive records have been produced by the County to either request as of the date of this letter.

2
CONT

During our review of the MND, we identified that the “First Carbon Solutions, Phase 1 Cultural Resources Assessment, dated January 20, 2023” (“Assessment”) is referenced and relied upon in the MND, but has not been provided in response to our MND reference document request. This missing Assessment is critical to understanding the MND’s analysis of the Project’s significant impacts on cultural resources and proposed mitigation measure (CULT-1). The MND references several recommendations made by First Carbon Solutions in the Assessment to lessen the significant impacts on cultural resources and also refers to Appendix E of the Assessment, which purportedly contains the “Cultural Resources Regulations and Evaluation Criteria.”¹⁴ Yet none of this information and analysis has been provided for public review and comment during the comment period on the MND.

3

Without access to this assessment and its appendices during the public comment period on the MND, Napa-Solano Residents and other members of the public are deprived of having a meaningful opportunity to comment on the MND. The County’s failure to make the underlying MND documents available during the entire comment period precludes Napa-Solano Residents and other members of the public from evaluating the accuracy of the County’s impact analysis and the adequacy of the proposed mitigation. By failing to make all documents referenced in the MND “readily available” during the current comment period, the County is violating the clear procedural mandates of CEQA, to the detriment of Napa-Solano Residents and other members of the public who wish to meaningfully review and comment on the MND.

Accordingly, we request that:

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¹¹ Message from NextRequest to Jeanne Grube, ABJC re Request No. 24-924 (November 7, 2024); Message from NextRequest to Jeanne Grube, ABJC re Request No. 24-926 (November 8, 2024).

¹² Email from Jeanne Grube, ABJC, to Sean Trippi, Supervising Planner (November 13, 2024).

¹³ Email from Marie E Willis, Senior Office Assistant, Planning, Building, & Environmental Services, to Jeanne Grube, ABJC (November 13, 2024).

¹⁴ MND at p. 14.

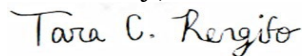
1) the County immediately provide us with access to the missing document identified above and all documents referenced or relied upon in the MND, as requested in our November 7, 2024 MND reference document request; and

2) the County extend the public review and comment period on the MND for at least thirty (30) days from the date on which the County releases these documents for public review.

Given the short time before the current comment deadline, please contact me as soon as possible with your response to this request, but no later than tomorrow, November 15, 2024.

Please feel free to email with any questions at tregifo@adamsbroadwell.com. Thank you for your prompt attention and response to this matter.

Sincerely,



Tara C. Rengifo

Attachments

TCR:acp

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CONT

EXHIBIT A

November 7, 2024

Via Email and U.S. Mail

Brian D. Bordona
Director
County of Napa Planning, Building, and
Environmental Services Department
1195 Third Street
Suite 210
Napa, CA 94559
Email: Brian.bordona@countyofnapa.org

Neha Hoskins
Clerk of the Board of Supervisors
County of Napa
1195 Third Street, Suite 310
Napa, CA 94559
Email:
clerkoftheboard@countyofnapa.org
Neha.hoskins@countyofnapa.org

Via Email Only

Sean Trippi, Supervising Planner
County of Napa
Sean.trippi@countyofnapa.org

**Re: Request for Immediate Access to Documents Referenced or
Relied Upon in the Mitigated Negative Declaration (MND)
(SCH: 2024100855) for the E&P Technology Way Buildings A
and B (Use Permits #P22-00307 and #P22-00308)**

Dear Mr. Bordona, Ms. Hoskins, and Mr. Trippi:

We are writing on behalf of Napa-Solano Residents for Responsible Development (“Napa-Solano Residents”) to request *immediate access* to a copy of any and all documents referenced or relied upon in the Mitigated Negative Declaration (“MND”) (SCH:2024100855) for the E&P Technology Way Buildings A and B (Use Permits #P22-00307 and #P22-00308) Project (“Project”), proposed by Michael Kelley (“Applicant”). This excludes documents available on the County website here: <https://www.pbes.cloud/index.php/s/ptc3SDW98WWmLnZ?> (Building A) or <https://www.pbes.cloud/index.php/s/4DJdazPtwt7P6wN> (Building B).

The project proposes construction of a wine production facility (Building A) in a 143,312 SF-building with the necessary equipment for annual production of 450,000 gallons of wine. Building B proposes construction of an accompanying warehouse of 66,915 SF.

The project site is in the Napa Valley Business Park on the North side of Technology Way and Morris Court (APN 057-250-030 – Building A, and APN 057-250-031, -031 Building B).

Our request for all documents referenced or relied upon in the MND is made pursuant to the California Environmental Quality Act (CEQA”), which requires that all documents referenced, and incorporated by reference, in an environmental review document be made available to the public for the entire comment period.¹

If the requested documents are in electronic format, please send them via a file hosting service such as Dropbox. If the electronic documents are 10 MB or less (or can be easily broken into chunks of 10 MB or less), please email them to jgrube@adamsbroadwell.com as attachments. Otherwise, please send the above requested items by U.S. Mail to our Sacramento Office as follows:

U.S. Mail

Jeanne K. Grube
Adams Broadwell Joseph & Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95814

Email

jgrube@adamsbroadwell.com

Sincerely,



Jeanne K. Grube
Paralegal

JKG:acp

¹ See Pub. Resources Code, § 21092, subd. (b)(1); 14 Cal. Code Reg. § 15072(g)(4) (stating that all documents incorporated by reference in the MND . . . “shall be readily accessible to the public”); *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442, as modified (Apr. 18, 2007).

EXHIBIT B

November 7, 2024

Via Email and U.S. Mail

Brian D. Bordona
Director
County of Napa Planning, Building, and
Environmental Services Department
1195 Third Street
Suite 210
Napa, CA 94559
Email: Brian.bordona@countyofnapa.org

Neha Hoskins
Clerk of the Board of Supervisors
County of Napa
1195 Third Street, Suite 310
Napa, CA 94559
Email:
clerkoftheboard@countyofnapa.org
Neha.hoskins@countyofnapa.org

Via Email Only

Sean Trippi, Supervising Planner
County of Napa
Sean.trippi@countyofnapa.org

Via Online Portal

<https://countyofnapa.nextrequest.com/>

**Re: Request for Immediate Access to Public Records - E&P
Technology Way Buildings A and B (Use Permits #P22-00307
and #P22-00308) (SCH: 2024100855), proposed by Michael Kelley**

Dear Mr. Bordona, Ms. Hoskings, and Mr. Trippi:

We are writing on behalf of Napa-Solano Residents for Responsible Development (“Napa-Solano Residents”) to request ***immediate access*** to any and all public records in the County of Napa’s possession referring or related to the E&P Technology Way Building A and B (Use Permits #P22-00307 and #P22-00308) Project (“Project”) proposed by Michael Kelley (“Applicant”). This request includes, but is not limited to, any and all file materials, applications, correspondence, resolutions, memos, notes, analysis, email messages, files, maps, charts, and any other documents related to the Project. This request excludes documents available on the County website here:

<https://www.pbes.cloud/index.php/s/ptc3SDW98WWmLnZ?> (Building A) or
<https://www.pbes.cloud/index.php/s/4DjdazPtw7P6wN> (Building B).

The project proposes construction of a wine production facility (Building A) in a 143,312 SF-building with the necessary equipment for annual production of 450,000 gallons of wine. Building B proposes construction of an accompanying warehouse of 66,915 SF.

The project site is in the Napa Valley Business Park on the North side of Technology Way and Morris Court (APN 057-250-030 – Building A, and APN 057-250-031, -031 Building B).

Napa-Solano Residents is an unincorporated association of individuals and labor organizations that may be adversely affected by the environmental and public health impacts associated with Project development. Napa-Solano Residents includes the International Brotherhood of Electrical Workers Local 180, Plumbers & Steamfitters Local 343, Sheet Metal Workers Local 104, Sprinkler Fitters Local 483, District Council of Ironworkers and their members and families; and other individuals that live and/or work in Napa County.

This request is made pursuant to the **California Public Records Act** (Government Code §§ 7920.000, *et seq.*). This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a Constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We request *immediate access* to review the above documents pursuant to section 7922.525 of the Public Records Act, which requires public records to be “open to inspection at all times during the office hours of a state or local agency” and provides that “every person has a right to inspect any public record.”¹ Therefore, the 10-day response period applicable to a “request for a copy of records” under Section 7922.535(a) does not apply to this request.

¹ Gov. Code §7922.525(a).

We request access to the above records in their original form, as maintained by the agency.² Pursuant to Government Code Section 7922.570, if the requested documents are in electronic format, please upload them to a file hosting program such as Dropbox, NextRequest or a similar program. Alternatively, if the electronic documents are 10 MB or less (or can be easily broken into sections of 10 MB or less), they may be emailed to me as attachments.

We will pay for any direct costs of duplication associated with filling this request up to \$200. However, please contact me at (916) 444-6201 with a cost estimate before copying/scanning the materials.

Please use the following contact information for all correspondence:

U.S. Mail

Jeanne K. Grube
Adams Broadwell Joseph & Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95815

Email

jgrube@adamsbroadwell.com

If you have any questions, please call me at (916) 444-6201 or email me at jgrube@adamsbroadwell.com. Thank you for your assistance with this matter.

Sincerely,



Jeanne K. Grube
Paralegal

JKG:acp

² Gov. Code § 7922.570; *Sierra Club v. Super. Ct.* (2013) 57 Cal. 4th 157, 161-62.

ADAMS BROADWELL JOSEPH & CARDOZO

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ALAURO R. MCGUIRE
TARA C. RENGIFO

Of Counsel

MARC D. JOSEPH
DANIEL L. CARDOZO

November 19, 2024

Via Email and Overnight Mail

Chair Dave Whitmer
Vice Chair Heather Phillips
Commissioner Kara Brunzell
Commissioner Andrew Mazotti
Commissioner Megan Dameron
1195 Third Street, Third Floor
Napa, CA 94559

Email:

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Heather.Phillips@countyofnapa.org;
Kara.Brunzell@countyofnapa.org;
andrewmazotti@gmail.com;
megan.dameron@countyofnapa.org

Brian D. Bordona, Director
Sean Trippi, Supervising Planner
Sean Kennings, Contract Planner
County of Napa Planning, Building,
and Environmental Services
Department
1195 Third Street, Suite 210
Napa, CA 94559

Email:

Brian.bordona@countyofnapa.org;
Sean.trippi@countyofnapa.org;
sean@lakassociates.com

Re: Agenda Item #7: Comments on the Initial Study/Mitigated Negative Declaration for the E&P Technology Way - Buildings A & B (Use Permits #P22-00307 and #P22-00308) (SCH: 2024100855)

Dear Chair Dave Whitmer, Vice Chair Heather Phillips, Commissioner Kara Brunzell, Commissioner Andrew Mazotti, Commissioner Megan Dameron, Director Bordona, Mr. Trippi, and Mr. Kennings:

On behalf of Napa-Solano Residents for Responsible Development ("Napa-Solano Residents"), we submit these comments on the Initial Study/Mitigated Negative Declaration (collectively, "MND")¹ prepared pursuant to the California Environmental Quality Act ("CEQA")² by Napa County ("County") for the E&P Technology Way - Buildings A and B (Use Permits #P22-00307 and #P22-00308) (SCH: 2024100855) ("Project"), proposed by Michael Kelley ("Applicant").

¹ Napa County, *Initial Study/Mitigated Negative Declaration for E&P Technology Way - Buildings A & B (Use Permits #P22-00307 and #P22-00308)* (October 2024), available at: <https://ceqanet.opr.ca.gov/2024100855> (hereinafter "MND").

² Pub. Resources Code § 21000 *et seq.*; 14 C.C.R. §§ 15000, *et seq.*
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Page 2

The Project proposes to construct two separate buildings on three parcels comprising two sites: Building A is proposed on a 13.2-acre parcel on the north side of Technology Way and Morris Court (APN 057-250-030) and Building B is proposed on a 6.87-acre project site on the north side of Technology Way, opposite Gateway Road West (APN's 057-250-031 and -032, which will be combined).³ Both sites are located in the Napa Valley Business Park Specific Plan ("NVBPSP") area within the IP:AC (Industrial Park: Airport Compatibility) Zoning District.⁴

Building A is a 143,312 square foot ("SF") refrigerated wine production facility with an annual production capacity of 450,000 gallons.⁵ The winery uses will include grape crushing, bulk wine processing and storage, stainless steel tank and barrel storage, bottling, and office space.⁶ An additional 13,000 SF of covered outdoor work area is also proposed for the north side of the building.⁷ During non-harvest season, the facility will have 16 full-time and 7 part-time employees, which will increase during harvest to approximately 35 total employees.⁸ Building A will have 129 parking spaces and eight (8) spaces for semi-trailers.⁹

Building B is a proposed 66,915 SF building for warehouse uses that the MND claims will be "consistent with allowable warehouse uses as outlined in Industrial Park zoning district (18.40.020) and the [NVBPSP]."¹⁰ Building B will be utilized primarily for warehousing/distribution as well as office space.¹¹ The facility will be run by up to 30 employees but no user has been identified.¹² There will be no retail sales and no access for the general public.¹³

The Building A and Building B projects will be provided with water service from the City of American Canyon.¹⁴ Napa Sanitation District will provide sewer.¹⁵

³ Napa County, *Staff Report for the E&P Technology Way - Buildings A & B (Use Permits #P22-00307 and #P22-00308) Project* at p. 2 (November 8, 2024).

⁴ *Ibid.*

⁵ MND at p. 1.

⁶ *Ibid.*

⁷ *Ibid.*

⁸ *Ibid.*

⁹ *Ibid.*

¹⁰ *Id.* at p. 2.

¹¹ *Ibid.*

¹² *Ibid.*

¹³ *Ibid.*

¹⁴ *Ibid.*

¹⁵ *Ibid.*

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We reviewed the MND and its technical appendices with the assistance of Napa-Solano Residents' expert consultants, including air quality, public health, and greenhouse gas ("GHG") emissions expert James Clark, biological resources expert Dr. Shawn Smallwood, and transportation expert Daniel Smith. Mr. Clark's technical comments and curriculum vitae are attached hereto as Exhibit A.¹⁶ Dr. Smallwood's technical comments and curriculum vitae are attached hereto as Exhibit B.¹⁷ Mr. Smith's technical comments and curriculum vitae are attached hereto as Exhibit C.¹⁸ These comment letters and all attachments thereto are incorporated by reference as if fully set forth herein.¹⁹

Based on our review of the MND, the MND fails as an informational document under CEQA and lacks substantial evidence to support its conclusions that the Project's significant impacts would be mitigated to less than significant levels, as asserted in the MND. The MND lacks an adequate project description and fails to adequately characterize the Project site's environmental setting. There is also substantial evidence to support a fair argument that the Project would have potentially significant environmental impacts on air quality, greenhouse gas ("GHG") emissions, biological resources, transportation, and agricultural lands. Napa-Solano Residents and their expert consultants have identified potentially significant impacts that the MND either mischaracterizes, underestimates, or fails to identify. Moreover, the mitigation measures described in the MND will not, in fact, reduce impacts to less-than-significant levels.

For the foregoing reasons and as explained in detail herein, the County must prepare an Environmental Impact Report ("EIR") for the Project before the County may consider Project approval.

¹⁶ Exhibit A, James Clark, *Comments on the Initial Study/Mitigated Negative Declaration for the E&P Technology Way - Buildings A & B (Use Permits #P22-00307 and #P22-00308) Project* (hereinafter "Clark Comments").

¹⁷ Exhibit B, Dr. Smallwood, *Comments on the Initial Study/Mitigated Negative Declaration for the E&P Technology Way - Buildings A & B (Use Permits #P22-00307 and #P22-00308) Project* (hereinafter "Smallwood Comments").

¹⁸ Exhibit C, Daniel Smith, *Comments on the Initial Study/Mitigated Negative Declaration for the E&P Technology Way - Buildings A & B (Use Permits #P22-00307 and #P22-00308) Project* (hereinafter "Smith Comments").

¹⁹ Napa-Solano Residents reserves the right to supplement these comments, and to file further comments at any and all future proceedings and hearings related to the Project. Gov. Code § 65009(b); Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199-1203; see also *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.
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November 19, 2024
Page 4

I. STATEMENT OF INTEREST

Napa-Solano Residents is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential environmental impacts associated with Project development. Napa-Solano Residents includes members of the International Brotherhood of Electrical Workers Local 180, Plumbers & Steamfitters Local 343, Sheet Metal Workers Local 104, Sprinkler Fitters Local 483, the District Council of Ironworkers, and their members and their families, and other individuals that live and/or work in Napa County.

Napa-Solano Residents supports the development of sustainable residential, commercial, and industrial centers where properly analyzed and carefully planned to minimize impacts on public health and the environment. Developments like the Project should avoid adverse impacts to air quality, biological resources, transportation, and public health, and should take all feasible steps to ensure unavoidable impacts are mitigated to the maximum extent feasible. Only by maintaining the highest standards can development truly be sustainable.

The individual members of Napa-Solano Residents and the members of the affiliated labor organizations live, work, recreate and raise their families in and around Napa County. They would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work constructing the Project itself. They would be the first in line to be exposed to any health and safety hazards which may be present on the Project site. They each have a personal interest in protecting the Project area from unnecessary, adverse environmental and public health impacts.

Napa-Solano Residents and its members also have an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for the members they represent. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for industry to expand in Napa County, and by making it less desirable for businesses to locate and people to live and recreate in the County, including the Project vicinity. Continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduces future employment opportunities.

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Finally, Napa-Solano Residents is concerned with projects that can result in serious environmental harm without providing countervailing economic benefits. CEQA provides a balancing process whereby economic benefits, including the provision of jobs for highly trained workers, are weighed against significant impacts to the environment.²⁰ It is in this spirit we offer these comments.

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CONT

II. LEGAL BACKGROUND

CEQA requires that lead agencies analyze a project with potentially significant environmental impacts in an EIR.²¹ The purpose of the EIR “is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR ‘protects not only the environment, but also informed self-government.’”²² The EIR has been described “as an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.”²³

CEQA’s purpose and goals must be met through the preparation of an EIR, except in certain limited circumstances. CEQA contains a strong presumption in favor of requiring a lead agency to prepare an EIR. This presumption is reflected in the “fair argument” standard. Under that standard, a lead agency “shall” prepare an EIR whenever substantial evidence in the whole record before the agency supports a fair argument that a project may have a significant effect on the environment.²⁴

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In contrast, a mitigated negative declaration may be prepared only when, after preparing an initial study, a lead agency determines that a project may have a significant effect on the environment, but:

²⁰ Pub. Res. Code § 21081 (a)(3); *Citizens for Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App.3d 151, 171.

²¹ See Pub. Res. Code § 21000; 14 C.C.R. § 15002.

²² *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564 [internal citations omitted].

²³ *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.

²⁴ Pub. Res. Code §§ 21080(d); 21082.2(d); 14 C.C.R. §§ 15002(k)(3), 15064(f)(1), (h)(1); *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150-151; *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1601-1602.

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(1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review **would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur**, and (2) there is **no substantial evidence** in light of the whole record before the public agency that the project, as revised, **may** have a significant effect on the environment.²⁵

Courts have held that “[i]f no EIR has been prepared for a nonexempt project, but substantial evidence in the record supports a fair argument that the project may result in significant adverse impacts, the proper remedy is to order preparation of an EIR.”²⁶ The fair argument standard creates a “low threshold” favoring environmental review through an EIR, rather than through issuance of a negative declaration.²⁷ An agency’s decision not to require an EIR can be upheld only when there is no credible evidence to the contrary.²⁸

“Substantial evidence” required to support a fair argument is defined as “enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.”²⁹

According to the CEQA Guidelines, when determining whether an EIR is required, the lead agency is required to apply the principles set forth in Section 15064, subdivision (g):

[I]n marginal cases where it is not clear whether there is substantial evidence that a project may have a significant effect on the environment, the lead agency shall be guided by the following principle: If there is disagreement

²⁵ Pub. Res. Code § 21064.5 (emphasis added).

²⁶ See, e.g., *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 319-320.

²⁷ *Citizens Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754 [internal citations omitted].

²⁸ *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1318; see also *Friends of B Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1002 (“If there was substantial evidence that the proposed project might have a significant environmental impact, evidence to the contrary is not sufficient to support a decision to dispense with preparation of an EIR and adopt a negative declaration, because it could be ‘fairly argued’ that the project might have a significant environmental impact”).

²⁹ 14 C.C.R. § 15384(a).

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among expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR.³⁰

With respect to this Project, the MND fails to satisfy the basic purposes of CEQA. The MND fails to adequately disclose, investigate, and analyze the Project's potentially significant impacts during construction and operation, and fails to provide substantial evidence to support its conclusions that impacts will be mitigated to a less than significant level.³¹ Because substantial evidence shows that the Project may result in potentially significant impacts, a fair argument can be made that the Project may cause significant impacts requiring the preparation of an EIR.

4
CONT

III. THE MND FAILS TO PROVIDE A COMPLETE PROJECT DESCRIPTION

CEQA requires that an Initial Study include a description of the project.³² "An accurate and complete project description is necessary for an intelligent evaluation of the potential environmental impacts of the agency's action... Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal ... and weigh other alternatives in the balance."³³ Without a complete project description, the environmental analysis under CEQA is impermissibly limited, thus minimizing the project's impacts and undermining meaningful public review.³⁴

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The MND relies on an inadequate Project Description because it omits critical details about the Project's construction timeline and activities, the frequency and number of clients that will visit Building A during operations, and the construction and operation of new recycled water facilities. As a result of these deficiencies, the Project Description in the MND misleads the public by failing to describe the full scope of the Project and its impacts.

³⁰ *Id.* at § 15064(g).

³¹ Pub. Res. Code § 21064.5.

³² 14 C.C.R. § 15063(d)(1).

³³ *County of Inyo*, 71 Cal.App.3d at 192-193.

³⁴ *See, e.g., Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376. 7601-007j

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Page 8

First, the MND's Project Description fails to provide information regarding the Project's construction timeline or identify the activities during construction. The Project Description must disclose the timeline for construction, the construction activities that will occur and equipment to be utilized during each construction phase, the start date for construction, and if construction will occur simultaneously for both buildings. The failure to provide this information in the Project Description affects the impacts analysis related to air quality, public health, GHG emissions, and biological resources, among others.

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Construction activities require soil disturbing activities, heavy equipment, and numerous hauling truck trips that can significantly impact air quality and public health. An adequate description of the Project's construction period is critical to an informed analysis of the Project's impacts on air quality and public health during construction. Omitting this information in the Project Description also precludes any evaluation of construction-related air quality and GHG emissions. The lack of information concerning the Project's construction phase also severely affects the MND's biological resources impacts analysis. When and where construction activities may occur can directly impact the Project's effects on biological resources such as migratory birds. The County's own evidence acknowledges that avian species have the potential to nest on the Project site, yet the MND lacks any analysis about whether ground-disturbing activities could commence during the nesting season (February 1 through August 31).³⁵

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Second, the Project Description fails to provide details about the expected visitors to Building A during Project operations. The MND explains that clients will travel onsite to meet with distributors, restaurants, wine shop owners, and other wine buyers but no other information is provided about these visits.³⁶ Daniel Smith, Napa-Solano Residents' transportation expert, comments that details about the frequency of these visitor meetings and the estimated number of visitors must be disclosed in the Project Description to allow for an adequate analysis of the Project's VMT impacts.³⁷ The VMT analysis for the Project only evaluates full time and part time employees, even though the Napa County Winery Trip Generation Worksheet relied upon in the trip generation analysis has a line item for "maximum daily

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³⁵ First Carbon Solutions, *Biological Resources Analysis* at p. 34 (January 30, 2024; updated February 21, 2024).

³⁶ MND at 2.

³⁷ Smith Comments at p. 2.
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visitation.”³⁸ The MND confirms visitor trips will occur as part of the Project yet improperly omits these trips from the VMT analysis.³⁹ Mr. Smith concludes that the Project Description as well as the transportation impact analysis is deficient in omitting this information.

8
CONT

Finally, since the Project site is within NapaSan’s recycled water service area, the Project is required to install new facilities to utilize recycled water for landscape irrigation.⁴⁰ Yet the Project Description omits any discussion about the construction and operation of these new recycled water facilities, which are required for the Project.⁴¹ As of 2023, the Project had requested service for approximately 3.2 acres of landscaping with a recycled water demand of approximately 5.4 acre-feet per year.⁴² To be serviced by the existing NapaSan recycled water service area, the Project may need to construct new pipelines, install service connections, add metering devices, install on-site storage tanks, and retrofit the irrigation system to handle recycled water. The construction and operation of these Project components must be evaluated in the MND as part of the whole of the action. Construction of these facilities may worsen the impacts on air quality, noise, biological resources, and transportation. During operations, pumps or other parts of the facilities may require electricity, thereby increasing energy impacts. Thus, information regarding the facilities that must be installed for the Project to use recycled water from NapaSan for landscape irrigation must be disclosed in the Project Description and analyzed to determine the significance of environmental impacts.

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A complete Project Description is necessary to ensure informed decision making and meaningful public review.⁴³ Approving a project without having identified and mitigated all of the project’s significant environmental effects violates CEQA’s requirements. An EIR must be prepared which fully discloses all components of the Project.

³⁸ W-Trans, *Transportation Impact Study* at Appendix C (November 21, 2023); Smith Comments at p. 2.

³⁹ *Ibid.*

⁴⁰ Letter to the Napa County Planning, Building & Environmental Services from Gavin Glascott, Assistant Civil Engineer at NapaSan at p. 2 (February 1, 2023).

⁴¹ *Ibid.*

⁴² *Ibid.*

⁴³ *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26. 7601-007j

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IV. THE MND FAILS TO ADEQUATELY DESCRIBE THE ENVIRONMENTAL SETTING FOR BIOLOGICAL RESOURCES

The MND fails to adequately describe the environmental setting against which the Project’s impacts on biological resources are to be measured. This contravenes the fundamental purpose of the environmental review process, which is to determine whether there is a potentially substantial, adverse change compared to the existing setting.⁴⁴ CEQA requires that a lead agency include a description of the physical environmental conditions, or “baseline,” in the vicinity of the project as they exist at the time environmental review commences.⁴⁵ As the courts have repeatedly held, the impacts of a project must be measured against the “real conditions on the ground.”⁴⁶ The description of the environmental setting constitutes the “baseline” physical conditions against which the lead agency assesses the significance of a project’s impacts.⁴⁷ An environmental setting is required “to give the public and decision makers the most accurate and understandable picture practically possible of the project’s likely near-term and long-term impacts.”⁴⁸

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To establish the Project’s baseline for biological resources, a Biological Resources Analysis was prepared earlier this year that reviewed the California Natural Diversity Database (“CNDDDB”) polygons that overlap with the Project site and relied on a wildlife and botanical survey performed on December 8, 2022—nearly two years ago.⁴⁹ Based on the Biological Resource Analysis, the MND describes the Project site as having been impacted by disking and a lack of vegetation.⁵⁰

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⁴⁴ 14 C.C.R. § 15063(d).

⁴⁵ 14 C.C.R. § 15125(a); *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal. 4th 310, 321.

⁴⁶ *Id.*; *Save Our Peninsula Com. v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 121-22; *City of Carmel-by-the-Sea v. Bd. of Supervisors of Monterey County* (1986) 183 Cal.App.3d 229, 246.

⁴⁷ 14 C.C.R. § 15125(a); *Communities for a Better Environment v. South Coast Air Quality Management Dist.*, 48 Cal. 4th at 321.

⁴⁸ 14 C.C.R. § 15125(a).

⁴⁹ MND at p. 10.

⁵⁰ *Ibid.* Notably, the NVBPSP describes the area as containing grassland that provide “principal habitat” for several birds and mammals as well as hunting and feeding ground for other wildlife. Napa County, *Napa Valley Business Park Specific Plan & EIR* at pp. 249-250 (Adopted July 29, 1986; amended thru October 22, 2013).

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Dr. Smallwood recognizes that the characterization of the environmental setting, including the regional setting, is essential for proper CEQA analysis. These steps typically include (1) surveys of the site for biological resources, and (2) reviews of literature, databases, and local experts for documented occurrences of special-status species.⁵¹ With regards to the Project's biological resources survey, Dr. Smallwood's comments provide substantial evidence that the survey is inadequate to establish the environmental setting for several reasons.⁵² For example, Dr. Smallwood comments that the duration of the December 2022 biological resources survey is unknown, the proper California Department of Fish and Wildlife ("CDFW") guidelines were not implemented for rare plants, and surveys were not performed for bats and reptiles.⁵³

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Dr. Smallwood's comments also identify several issues with the Project's desktop review.⁵⁴ By way of example, the Biological Resources Analysis relied upon the CNDDDB to identify documented occurrences of special-status species, but as Dr. Smallwood comments, the desktop review did not also involve a search of eBird or iNaturalist.⁵⁵ A more complete database review would have shown that some of the species omitted from consideration in the Biological Resources Analysis have actually been recorded on the Project site, according to Dr. Smallwood.⁵⁶ Moreover, of the 31 species identified in the MND as having a very low occurrence potential, Dr. Smallwood emphasizes that three of those species have been documented on the Project site and of the 13 species determined to have no potential to occur on the site, one of those species was documented on the site.⁵⁷

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Furthermore, based on his own survey efforts in the area and database reviews, Dr. Smallwood determines that there are around 125 special-status species known to occur within sufficient proximity to the Project site.⁵⁸ Of those 125 special-status species, Dr. Smallwood states that 8 species were recorded on or adjacent to the Project site, 46 species were documented within 1.5 miles of the site, 25 species were within 1.5-4 miles of the site, and 41 were identified within 4-30 miles of the

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⁵¹ Smallwood Comments at p. 1.

⁵² *Id.* at pp. 2, 11.

⁵³ *Id.* at p. 11.

⁵⁴ *Id.* at pp. 11-23.

⁵⁵ *Id.* at p. 11.

⁵⁶ *Id.* at p. 12.

⁵⁷ *Ibid.*

⁵⁸ *Id.* at p. 12.

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site.⁵⁹ While the Project’s survey effort only resulted in the detection of 13 taxa of vertebrate wildlife, Dr. Smallwood has detected 69 species of vertebrate wildlife—of which 13 species were special-status species—during visual-scan surveys at three locations within 700 m of the Project site.⁶⁰ Dr. Smallwood has also surveyed for biological resources at three locations around 2.7 miles south/southeast of the Project site where he, along with the other consulting firms, detected 44 species of vertebrate wildlife.⁶¹

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For the foregoing reasons, Dr. Smallwood concludes that the MND and Biological Resources Analysis fail to accurately describe the Project’s environmental setting for biological resources.⁶² Dr. Smallwood’s own desktop review and survey efforts demonstrate that the Project site supports multiple special-status species of wildlife that are not disclosed and analyzed in the MND.⁶³ These errors and omissions in the baseline for biological resources prevents the County from adequately assessing impacts to the existing environment at the Project site. The environmental setting and impacts analysis must be adequately disclosed and analyzed in an EIR.

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V. AN EIR IS REQUIRED BECAUSE THERE IS SUBSTANTIAL EVIDENCE SUPPORTING A FAIR ARGUMENT THAT THE PROJECT MAY HAVE SIGNIFICANT IMPACTS

An MND is improper, and an EIR must be prepared, whenever it can be fairly argued on the basis of substantial evidence that the project may have a significant environmental impact.⁶⁴ “[S]ignificant effect on the environment” is defined as “a substantial, or potentially substantial, adverse change in the environment.”⁶⁵ An effect on the environment need not be “momentous” to meet the

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⁵⁹ *Ibid.*

⁶⁰ *Id.* at p. 2.

⁶¹ *Ibid.*

⁶² *Id.* at p. 12.

⁶³ *Ibid.*

⁶⁴ Pub. Res. Code § 21151; 14 C.C.R. § 15064(f)(1); *Citizens for Responsible Equitable Env’tl Dev. v. City of Chula Vista* (2011) 197 Cal.App.4th 327, 330-31; *Communities for a Better Env’t v. South Coast Air Quality Mgmt. Dist.* (2010) 48 Cal.4th 310, 319.

⁶⁵ Pub. Res. Code § 21068; 14 C.C.R. § 15382.

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CEQA test for significance; it is enough that the impacts are “not trivial.”⁶⁶ Substantial evidence, for purposes of the fair argument standard, includes “fact, a reasonable assumption predicated upon fact, or **expert opinion** supported by fact.”⁶⁷

Moreover, the failure to provide information required by CEQA is a failure to proceed in the manner required by CEQA.⁶⁸ Challenges to an agency’s failure to proceed in the manner required by CEQA, such as the failure to address a subject required to be covered in an MND or to disclose information about a project’s environmental effects or alternatives, are subject to a less deferential standard than challenges to an agency’s factual conclusions.⁶⁹ Even when the substantial evidence standard is applicable to agency decisions to certify an MND and approve a project, reviewing courts will not “uncritically rely on every study or analysis presented by a project proponent in support of its position. A clearly inadequate or unsupported study is entitled to no judicial deference.”⁷⁰

A. Substantial Evidence Supports a Fair Argument that the Project’s Impacts on Air Quality are Potentially Significant

The MND lacks substantial evidence to support its conclusion that the Project would result in less-than-significant impacts on air quality.⁷¹ The MND does not include any modeling of the Project’s emissions during construction or operations as is typically done in CEQA documents to evaluate a project’s air quality impacts; however, James Clark performed detailed emissions calculations using CalEEMod.⁷² Based on his modeling, Mr. Clark identifies a potentially significant air quality impact during the construction phase of the Project.⁷³ Mr. Clark finds that the Project’s emissions of reactive organic gases (“ROGs”) during the architectural coating phase in summer months would exceed the Bay Area Air Quality Management District’s (“BAAQMD”) significance threshold unless

⁶⁶ *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 83.

⁶⁷ Pub. Res. Code § 21080(e)(1) (emphasis added).

⁶⁸ *Sierra Club v. State Bd. Of Forestry* (1994) 7 Cal.4th 1215, 1236.

⁶⁹ *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.

⁷⁰ *Berkeley Keep Jets Over the Bay Committee v. Board of Port Com’rs* (2001) 91 Cal.App.4th 1344, 1355 [internal citations omitted].

⁷¹ MND at pp. 5-8.

⁷² Clark Comments at p. 5.

⁷³ *Ibid.*

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mitigation is imposed.⁷⁴ Mr. Clark recommends imposing a mitigation measure that requires the use of architectural coating products that have Volatile Organic Compound (“VOC”) contents of less than 50 grams per liter to reduce the ROG emissions to 49.9 lbs. per day, which is under the BAAQMD threshold of significance.⁷⁵

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Notably, Mr. Clark’s emission calculations do not include all of the Project’s construction emissions due to missing details about the grading activities for the construction of the Project’s bioretention basins, storm drain pipelines, wastewater and water system infrastructure improvements.⁷⁶ The Project’s air quality impacts may be more severe and require additional mitigation measures upon a complete analysis of all of the Project’s emissions.

B. Substantial Evidence Supports a Fair Argument that the Project’s Impacts on Greenhouse Gas Emissions are Potentially Significant

The MND lacks substantial evidence to support its conclusion that the Project would not have a significant impact on GHG emissions based on a qualitative analysis of the Project’s GHG emissions.⁷⁷ To support the less-than-significant determination, the MND relies on the Project’s adherence to BAAQMD design standards, the California Building Code requirements, and the County’s conditions of approval.⁷⁸ More specifically, the Planning Commission Staff Report for the Project explains that “[t]he applicant intends to implement the following GHG reduction methods for both buildings: generation of onsite renewable energy; habitat restoration/new vegetation; electric forklifts, build to CALGREEN Tier 1 standards; solar hot water heating; exceed Title 24 energy efficiency standards; energy conserving lighting; energy star/cool roofing; bicycle incentives; connection to recycled water; water efficient fixtures; low-impact development (LID); water efficient landscape; electric vehicle charging station installation; design to maximize

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⁷⁴ *Ibid.*

⁷⁵ *Ibid.*

⁷⁶ *Ibid.*

⁷⁷ MND at pp. 17-18.

⁷⁸ *Id.* at p. 18.

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daylighting of interior spaces; and, limited grading. A condition of approval is included to require implementation of the checked Voluntary Best Management Practices Measures submitted with the project application.”⁷⁹

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Mr. Clark reviewed the applications for Building A and Building B and found that minimal Voluntary Best Management Practices Measures had been selected by the Applicant.⁸⁰ These measures are limited to energy conserving lighting, installation of water efficient fixtures, water efficient landscape, planting of shade trees within 40 feet of the south side of the building elevation, and electric vehicle (“EV”) charging, specifically, dedicated parking provided for future EV charging stations.⁸¹ Only this limited set of measures will actually be implemented by the Applicant to reduce the Project’s GHG emissions, and only these measures will be included as conditions of approval for the Project.⁸² According to Mr. Clark, and contrary to statements in the Staff Report, “the Project will not involve the generation of onsite renewable energy; habitat restoration/new vegetation; electric forklifts, build to CALGREEN Tier 1 standards; solar hot water heating; exceed Title 24 energy efficiency standards; energy star/cool roofing; bicycle incentives; connection to recycled water; low-impact development (LID); design to maximize daylighting of interior spaces; and, limited grading to reduce impacts from GHG emissions.”⁸³ There is no evidence that such measures will be required for Project operations.

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Mr. Clark therefore concludes that “[t]o the extent that these additional GHG reduction strategies are necessary to reduce the Project’s GHG emissions to less than significant levels but are not required by the Project’s Conditions of Approval, the Project will have a significant and unmitigated impact on GHG emissions that must be evaluated in an EIR.”⁸⁴

⁷⁹ Napa County, *Staff Report for the E&P Technology Way - Buildings A & B (Use Permits #P22-00307 and #P22-00308)* at p. 8 (November 20, 2024).

⁸⁰ Clark Comments at p. 3.

⁸¹ *Ibid.*

⁸² *Ibid.*

⁸³ *Id.* at pp. 3-4.

⁸⁴ *Ibid.*

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C. Substantial Evidence Supports a Fair Argument that the Project's Impacts on Biological Resources are Potentially Significant

The MND lacks substantial evidence to support its conclusion that with the adoption of mitigation measures, the Project would not result in impacts on biological resources.⁸⁵ The Biological Resources Analysis acknowledges that the Project would result in the loss of non-native grassland, and ruderal habitats, but fails to adequately assess the potentially significant impacts from this habitat loss, as supported by Dr. Smallwood's comments.⁸⁶ Dr. Smallwood explains that habitat loss can cause "the immediate numerical decline of wildlife."⁸⁷ Through his own study, Dr. Smallwood has measured and quantified the impacts of habitat loss from development projects on wildlife and found that development—even with mitigation measures—results in a 66% loss of species on the site and a 48% loss of species in the project area.⁸⁸

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Dr. Smallwood also comments that habitat loss can "result[] in the permanent loss of productive capacity."⁸⁹ He explains that "[h]abitat fragmentation multiplies the negative effects of habitat loss on the productive capacities of biological species by preventing recruitment to habitat patches that have become too isolated or too small [internal citations omitted]."⁹⁰ Dr. Smallwood estimates that the annual loss of birds from the Project could be over 1,000 birds, many of which are otherwise protected by the state and federal Migratory Bird Treaty Acts.⁹¹ Dr. Smallwood therefore concludes that the Project may result in a significant impact on biological resources.⁹²

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Dr. Smallwood also comments that Project-generated traffic may significantly impact biological resources on and even beyond the Project footprint including, but not limited to, California tiger salamander, California red-legged frog, and American badger.⁹³ "Vehicle collisions have accounted for the deaths of many

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⁸⁵ MND at pp. 9-11.

⁸⁶ Smallwood Comments at p. 23.

⁸⁷ *Id.* at p. 24.

⁸⁸ *Id.* at pp. 23-24.

⁸⁹ *Id.* at p. 24.

⁹⁰ *Ibid.*

⁹¹ *Id.* at p. 25.

⁹² *Ibid.*

⁹³ *Ibid.*

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thousands of amphibian, reptile, mammal, bird, and arthropod fauna, and the impacts have often been found to be significant at the population level [internal citations omitted].”⁹⁴ A study of traffic-caused wildlife mortality in Contra Costa County, California found 1,275 carcasses of 49 species of mammals, birds, amphibians, and reptiles over a 15 month period.⁹⁵ Based on Dr. Smallwood’s estimates of traffic-related mortality from this Project, and the lack of any mitigation measures to reduce these impacts, Dr. Smallwood concludes that Project-generated traffic may cause significant impacts to biological resources that are not disclosed, analyzed, or mitigated in the MND.⁹⁶

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Dr. Smallwood also provides comments on several of the proposed mitigation measures for the Project’s significant impacts on biological resources.⁹⁷ First, MM BIO-1 requires the installation of silt fencing along the conservation easement boundary to the riparian corridor.⁹⁸ Dr. Smallwood recommends that the silt fence be installed 300 feet from the southern edge of the top of bank of Sheehy Creek to lessen significant impacts to terrestrial wildlife along the riparian corridor.⁹⁹ His recommendation is based on a study which found that from the edge of an aquatic site, core terrestrial habitat can span from 159 to 209 m for amphibians and from 127 to 289 m for reptiles.¹⁰⁰

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Second, for MM BIO-2 requiring a preconstruction survey for rare plants, Dr. Smallwood explains that the cited CDFW rare plant survey guidelines are for a reconnaissance survey that should be utilized to support preparation of the CEQA environmental review document and not a preconstruction survey for rare plants.¹⁰¹

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Third, MM BIO-3 would require implementation of a preconstruction survey for nesting birds and if nests are identified, buffers must be established around the nests from construction activities.¹⁰² Dr. Smallwood comments that the mitigation measure will not reduce the potentially significant impacts from habitat loss that he details in his comments to less-than-significant levels and that the measure

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⁹⁴ *Ibid.*

⁹⁵ *Id.* at p. 26.

⁹⁶ *Id.* at p. 27.

⁹⁷ *Id.* at pp. 27-28.

⁹⁸ MND at 11.

⁹⁹ Smallwood Comments at p. 27.

¹⁰⁰ *Ibid.*

¹⁰¹ *Ibid.*

¹⁰² MND at pp. 11-12.

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requires additional objective criteria to be effective, particularly regarding the determination of the buffer area size for any given species.¹⁰³ Without such objective criteria, the measure’s efficacy is questionable and it cannot be enforced.

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Fourth, MM BIO-6 concerns burrowing owls and Dr. Smallwood explains that given the recent designation of burrowing owl as candidate for Threatened or Endangered status under the California Endangered Species Act (“CESA”), no take of burrowing owls is allowed and “detection surveys are needed during both the non-breeding and breeding periods, as well as a preconstruction take-avoidance survey.”¹⁰⁴

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Finally, Dr. Smallwood identifies issues with the proposed mitigation measure to install exclusion fencing during the wet season in MM BIO-8.¹⁰⁵ He explains that unless a one-way passage is enabled, the proposed fencing could trap amphibians on the Project site. Additionally, Dr. Smallwood determines that MM BIO-8 “would not avoid substantial, highly significant impact[s] to amphibians such as to foothill yellow-legged frog. Compensatory mitigation would be warranted.”¹⁰⁶

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For the foregoing reasons, Dr. Smallwood’s comments provide substantial evidence supporting a fair argument that the Project’s impacts on biological resources may be significant and unmitigated. An EIR must be prepared to evaluate the Project’s potentially significant impacts on biological resources and all feasible mitigation measures.

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D. Substantial Evidence Supports a Fair Argument that the Project’s Impacts on Transportation are Potentially Significant

The MND fails to provide substantial evidence to support its conclusion that the Project would not result in significant transportation impacts after the implementation of MM TRANS-1.¹⁰⁷

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¹⁰³ Smallwood Comments at p. 28.

¹⁰⁴ *Ibid.*

¹⁰⁵ *Ibid.*

¹⁰⁶ *Ibid.*

¹⁰⁷ MND at pp. 25-28.

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First, Mr. Smith demonstrates that the MND improperly segments the Project's VMT impacts by separately analyzing impacts of Building A and Building B.¹⁰⁸ This piecemealing of the environmental review of the Project violates CEQA.¹⁰⁹ A project under CEQA means the "whole of an action which has the potential for resulting in either a direct physical change in the environment, or reasonably foreseeable indirect physical change in the environment."¹¹⁰ CEQA prohibits segmenting the review of the significant environmental impacts of a project.¹¹¹ CEQA mandates "that 'environmental considerations do not become submerged by chopping a large project into many little ones—each with a minimal potential impact on the environment—which cumulatively may have disastrous consequences.'"¹¹² Public agencies must construe the project broadly to capture the whole of the action and its environmental impacts.¹¹³

Before undertaking a project, the lead agency must assess the environmental impacts of all reasonably foreseeable phases of a project and a public agency may not segment a large project into two or more smaller projects in order to mask serious environmental consequences.¹¹⁴ "The CEQA process is intended to be a careful examination, fully open to the public, of the environmental consequences of a given project, covering the entire project, from start to finish."¹¹⁵

Here, however, Mr. Smith explains that while the MND's air quality analysis is based on the Project's total weekday trip estimate of 218 trips, the transportation analysis piecemeals the daily trip estimates for Building A from Building B's trips and fails to consider the VMT impacts from the whole Project.¹¹⁶ The MND utilizes the County's current Transportation Impact Study Guidelines' threshold of significance, which requires a project to prepare a Transportation Impact Study if it

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¹⁰⁸ Smith Comments at pp. 1-2.

¹⁰⁹ *Ibid.*

¹¹⁰ 14 C.C.R. § 15378(a).

¹¹¹ *Laurel Heights Improvement Assn.*, 47 Cal. 3d at 396; *See also* Pub. Res. Code § 21002.1(d).

¹¹² *Id.*; *See also* *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1452; *Citizens Assn. for Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App.3d 151, 165.

¹¹³ 14 C.C.R. § 15378.

¹¹⁴ *See Citizens Assn. for Sensible Development of Bishop Area*, 172 Cal. App. 3d at 165–168.

¹¹⁵ *Natural Resources Defense Council v. City of Los Angeles* (2002) 103 Cal.App.4th 268; *See also* *Whitman v. Board of Supervisors* (1979) 88 Cal.App.3d 402 (EIR for an exploratory oil well that failed to analyze the impacts associated with an proposed pipeline was inadequate and violated CEQA).

¹¹⁶ Smith Comments at pp. 1-2; MND at p. 7-8, 26.

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generates 110 or more net new daily vehicle trips.¹¹⁷ Building A is estimated to generate an average of 71 daily trips during non-harvest months and 104 trips per day during harvest months.¹¹⁸ Both estimates are under the threshold of significance.¹¹⁹ Building B is anticipated to generate 114 trips per day, which exceeds the threshold and triggers the requirement for a Transportation Demand Management Plan as mitigation (MM TRANS-1).¹²⁰ Mr. Smith explains that the MND impermissibly segments the Project's VMT impacts by splitting up the Project rather than evaluating the total daily trips for both buildings, i.e., 218 trips.¹²¹

Mr. Smith concludes that the Project's 218 daily trips would exceed the threshold of significance.¹²² Even with the mitigation for Building B, the MND estimates that the Project would result in a combined 202 VMT per day, which still exceeds the threshold of significance.¹²³ Therefore, the Project as a whole would cause a significant impact requiring mitigation measures to reduce these significant VMT impacts.¹²⁴ Given that there is a fair argument based on substantial evidence that the Project may have significant transportation impacts, an EIR must be prepared that fully evaluates these impacts as well as the necessary mitigation measures to lessen these impacts.

Second, Mr. Smith comments that the trip generation estimates for Building B are unsupported in the MND.¹²⁵ The MND estimates that Building B would require 44 parking spaces for the office uses and as stated in the Staff Report, there would be approximately 11,000 SF of office area in Building B.¹²⁶ Mr. Smith determines that Building B's office use "is not a small ancillary use to the warehouse," and would be over 16% of Building B's floor area.¹²⁷ As such, Mr. Smith states that the office uses in Building B must be analyzed based on the trip generation category for "Office" rather than "Warehouse."¹²⁸ Mr. Smith describes

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¹¹⁷ MND at p. 26.

¹¹⁸ *Ibid.*

¹¹⁹ *Ibid.*

¹²⁰ *Ibid.*

¹²¹ Smith Comments at p. 2.

¹²² *Ibid.*

¹²³ MND at p. 27.

¹²⁴ Smith Comments at p. 2.

¹²⁵ *Id.* at pp. 3-4.

¹²⁶ MND at p. 27; *see also* Napa County, *Staff Report for the E&P Technology Way - Buildings A & B (Use Permits #P22-00307 and #P22-00308)* at p. 13 (November 20, 2024).

¹²⁷ Smith Comments at p. 3.

¹²⁸ *Ibid.*

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the substantial disparity between trip generation rates for “Office” and trip generation rates for “Warehouse.”¹²⁹ He estimates that Building B’s office uses would generate around 6-8 times more traffic than the same square footage of warehouse.¹³⁰ Accordingly, Mr. Smith concludes that utilizing the correct trip generation categories for Building B’s uses would result in potentially significant VMT impacts that are not disclosed or mitigated in the MND.¹³¹

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Therefore, the MND fails to fully disclose, analyze, and mitigate the full scope of the Project’s potentially significant impacts on transportation. The County must prepare an EIR to fully disclose, analyze, and mitigate the impacts of the entire Project.

E. Substantial Evidence Supports a Fair Argument that the Project’s Impacts on Agricultural Resources are Potentially Significant

The MND fails to analyze the impacts from the conversion of farmland to non-agricultural use, as required by CEQA. The MND explains that “[a]ccording to Napa County GIS the property is categorized as Farmland of Local Importance. ... Undeveloped lands within the boundary of the NVBPSP are designated as Farmland of Local Importance because they include areas of soils that meet all the characteristics of Prime Farmland or of additional Farmland of Statewide Importance except for irrigation.”¹³² Farmland of Local Importance is “land of importance to the local economy, as defined by each county’s local advisory committee and adopted by its Board of Supervisors. Farmland of Local Importance is either currently producing, or has the capability of production; but does not meet the criteria of Prime, Statewide or Unique Farmland. Authority to adopt or to recommend changes to the category of Farmland of Local Importance rests with the Board of Supervisors in each county.”¹³³

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The MND nevertheless concludes that “[a]lthough the site, as well as other undeveloped land in the NVBPSP area, is classified as locally important, the site

¹²⁹ *Ibid.*

¹³⁰ *Ibid.*

¹³¹ *Ibid.*

¹³² MND at p. 5; see also California Department of Conservation, *California Important Farmland Finder*, available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>.

¹³³ *Farmland of Local Importance* (2018), available at: https://www.conservation.ca.gov/dlrp/fmmp/Documents/Farmland_of_Local_Importance_2018.pdf. 7601-007j

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has been designated for industrial/business park uses for over 35 years. ... As development in the NVBPSP area continues, the surrounding developed parcels have been reclassified as Urban and Built-up Land. The project will not result in the conversion of existing farmland. As such, there are no significant impacts to prime farmland created by the project.”¹³⁴ Despite the value of the site’s agricultural lands, and to justify a less-than-significant determination, the MND relies on the fact that the conversion of the site’s agricultural lands has been planned for and is therefore not significant. However, the EIR for the NVBPSP identified significant, unavoidable, and irreversible adverse impacts from the conversion of agricultural lands within the NVBPSP area because the “proposed industrial area could ultimately eliminate approximately 1,730 acres of what is presently defined as ‘agricultural or open land.’”¹³⁵ Since this Project would convert Farmland of Local Importance to non-agricultural uses, CEQA mandates that the impacts of this conversion be adequately disclosed, analyzed, and mitigated.

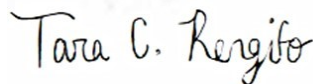
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VI. CONCLUSION

For the reasons discussed above, the MND for the Project is wholly inadequate under CEQA. An EIR must be circulated to provide a legally adequate analysis of, and mitigation for, all of the Project’s potentially significant impacts. Until an EIR is prepared and circulated, as described herein, the Project may not lawfully be approved.

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Sincerely,



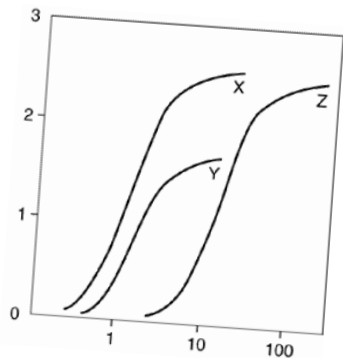
Tara C. Rengifo

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¹³⁴ MND at p. 5.

¹³⁵ Napa County, *Napa Valley Business Park Specific Plan & EIR* at p. 280 (Adopted July 29, 1986; amended thru October 22, 2013).

EXHIBIT A



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November 13, 2024

Adams Broadwell Joseph & Cardozo
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South San Francisco, CA 94080

Attn: Ms. Tara Rengifo

Subject: Comment Letter on Initial Study/Mitigated Negative Declaration (IS/MND) For E&P Technology Way - Building A & B Use Permit #'s P22-00307-UP and P22-00308-UP (APN's: 057-250-030, -031, -032), Napa County, California.

Dear Mrs. Rengifo:

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) has reviewed materials related to the above referenced project.

Clark's review of the materials in no way constitutes a validation of the conclusions or materials contained within the IS/MND. If we do not comment on a specific item, this does not constitute acceptance of the item.

Project Description:

The IS/MND prepared by the County of Napa (the County) describes the Project as consisting of two separate buildings. Building A is proposed as a 143,312 square foot (SF) building with an annual wine production capacity of 450,000 gallons. The winery uses will include grape crushing, bulk wine processing and storage, stainless steel tank and barrel storage, bottling, and office space. In addition, approximately 13,000 SF of covered outdoor work area will be located on the north side of the building. The proposal also includes 129 parking spaces and eight (8) spaces for semi-

trailers. Access will be provided by three (3) new driveways; one (1) on Technology and two (2) on Morris Court.

The winery building will provide for tank fermentation and storage for bulk wine in stainless steel tanks in a refrigerated building. The facility will be run by 16 full-time and 7 part time employees during non-harvest season. Seasonal help will increase during harvest to approximately 35 total employees. The building will be used during harvest for crushing up to 450,000 gallons of wine and tank fermentation of bulk wine and juice. Wine storage (tank and barrel) and bottling will take place on a year-round basis. Water demand and wastewater design will include demand for crush, bulk fermentation, storage, and bottling uses.

No retail sales or access for the general public is proposed. Individual clients will visit the site on occasion to hold meetings with members of the wine trade, such as their distributors, restaurants, wine shop owners and similar types of wine buyers. The only signage will be to identify the building as a winery facility.

The Building B project proposes to allow warehouse uses within the proposed 66,915 SF building. The floor area ratio (FAR) after full build out will be 22.4%, below the allowable 35%. All vehicles will enter from a new access driveway on Technology Way that runs along the eastern property line. Trucks will then off load or pick up at the rear of the building. Trucks will be able to circulate around the building in a one-way loop, exiting at a second driveway on Technology Way on the west side the building. The entrance driveway will be wide enough to accommodate two-way traffic.

Building B will be utilized primarily for warehousing/distribution with accessory office. The facility will be run by up to 30 employees. No user has yet been identified. There will be no retail sales and no access for the general public. The only signage will be to identify the building for the future tenant.

Both buildings include site-cast tilt-up concrete wall panels with a multi-color textured coating system and multiple score lines/reveals, storefront glazing systems, painted steel channel canopies, truck loading docks, grade level roll-up doors, and metal man-doors. Color choices include white, green, and grey painted stucco panels. The winery building also includes a covered outdoor work area for the crush pad in front of the loading docks.

The IS/MND does not provide sufficient information to justify the conclusion that the impacts are less than significant and no additional mitigation measures are required for the Project. The

analysis presented does not include an air quality analysis compiled in CalEEMOD as is typically performed in CEQA analyses. The County must compile the emission estimates in a meaningful manner in an environmental impact report (EIR) for the Project.

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CONT

Specific Comments:

1. The IS/MND Makes Assertions Regarding Greenhouse Gas (GHG) Reductions That Are Not Supported In The Applications For Building A and B. The Project's Impacts from Greenhouse Gas Emissions May be Significant and Unmitigated

The IS/MND did not quantify the Project's GHG emissions and instead performed a qualitative analysis of the Project's impacts from GHG emissions pursuant to BAAQMD thresholds. According to the MND, "BAAQMD recommends that a land use project must include specified minimum design elements to ensure that the project is contributing its 'fair share' toward achieving the state's key climate goal of carbon neutrality by 2045." The MND at page 18 concludes that "[i]f the proposed project adheres to these relevant design standards identified by BAAQMD, the requirements of the California Building Code, and the County's conditions of project approval, impacts are considered less than significant."

The Staff Report for the Project states on page 8 that: "The applicant intends to implement the following GHG reduction methods for both buildings: generation of onsite renewable energy; habitat restoration/new vegetation; electric forklifts, build to CALGREEN Tier 1 standards; solar hot water heating; exceed Title 24 energy efficiency standards; energy conserving lighting; energy star/cool roofing; bicycle incentives; connection to recycled water; water efficient fixtures; low-impact development (LID); water efficient landscape; electric vehicle charging station installation; design to maximize daylighting of interior spaces; and, limited grading. A condition of approval is included to require implementation of the checked Voluntary Best Management Practices Measures submitted with the project application."

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A review of the applications submitted for each of the buildings shows that only BMP-9 (Energy conserving lighting), BMP-14 (installation of water efficient fixtures), BMP-16 (water efficient landscaping), BMP-20 (planting of shade trees within 40 feet of the south side of the building elevation), BMP-21 (electrical vehicle charging station(s)) are checked in the applications and only these measures will be required by the Project's Conditions of Approval. Contrary to the statement in

the Staff Report, the Project will not involve the generation of onsite renewable energy; habitat restoration/new vegetation; electric forklifts, build to CALGREEN Tier 1 standards; solar hot water heating; exceed Title 24 energy efficiency standards; energy star/cool roofing; bicycle incentives; connection to recycled water; low-impact development (LID); design to maximize daylighting of interior spaces; and, limited grading to reduce impacts from GHG emissions.

I performed a quantitative analysis of the Project's GHG emissions using CalEEMOD. Using the default values within the CalEEMOD model I have calculated the following GHG emissions for the construction phase and the operational phase.

Phase	MT CO ₂ eq
Construction	18.8 per annum (564/30 years)
Operational	
Mobile	222
Area	3.08
Energy	415
Water	95.6
Waste	61.7
Refrigeration	632
Total	1,447.8

Based on my calculations, the incorporation of all of the mitigation measures identified in the Staff Report would reduce the Project's GHG mitigated emissions by 169 MT CO₂eq per year or 12% of the total emissions. The results of the analysis are attached as an exhibit to this letter.

To the extent that these additional GHG reduction strategies are necessary to reduce the Project's GHG emissions to less than significant levels but are not required by the Project's Conditions of Approval, the Project will have a significant and unmitigated impact on GHG emissions that must be evaluated in an EIR.

2. Using The Details Outlined In The IS/MND I Have Calculated The Emissions From The Project Using CalEEMOD. Without Mitigation Emissions Of Reactive Organic Gases (ROGs) Will Exceed The BA-AQMD Significance Thresholds.

Using the details outlined in the IS/MND I have calculated the emissions from the construction phase and operational phase using CalEEMOD. The IS/MND on page 29 states that there will be grading for construction of the bioretention basins, storm drain pipelines, wastewater and water system infrastructure improvements. The amount of soil disturbance is not detailed in the IS/MND and the emissions from the additional improvements were not included in the CalEEMOD analysis since they could not be quantified. The results of the analysis are attached as an exhibit to this letter.

The results of the analysis show that during the construction phase of the Project (Table 2.1 of the output) emissions of Reactive Organic Gases (ROGs) will exceed the BA-AQMD significance threshold. The exceedances occur during the architectural coating phase of the Project and will reach levels of 111 lbs per day during summer months if no mitigation measure is in place. Requiring the use of architectural coating products that have VOC contents less than 50 grams per liter would reduce the ROG levels to 49.9 lbs per day, below the BA-AQMD significance threshold. The County must evaluate the impacts of the Project in an EIR

Conclusion

The facts identified and referenced in this comment letter led me to reasonably conclude that the Project could result in significant impacts if allowed to proceed. An EIR should be prepared to address these substantial concerns.

Sincerely,



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Wine Warehouse Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Wine Warehouse
Construction Start Date	1/1/2025
Operational Year	2025
Lead Agency	Napa County PBES
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.60
Precipitation (days)	38.4
Location	Morris Ct & Technology Way, California 94558, USA
County	Napa
City	Unincorporated
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	801
EDFZ	2
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

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
Refrigerated Warehouse-No Rail	143	1000sqft	13.2	143,312	—	—	—	Building A

Unrefrigerated Warehouse-No Rail	66.9	1000sqft	6.87	66,915	—	—	—	Building B
Parking Lot	129	Space	1.16	0.00	—	—	—	Parking Lot For Building A
Parking Lot	82.0	Space	0.74	0.00	—	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

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.	111	111	12.0	17.6	0.03	0.44	0.97	1.42	0.41	0.24	0.65	—	4,093	4,093	0.15	0.19	5.72	4,159
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.89	3.28	29.8	29.1	0.06	1.23	9.37	10.6	1.14	3.69	4.83	—	6,761	6,761	0.27	0.19	0.15	6,785
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.63	6.54	11.7	14.3	0.03	0.46	2.13	2.59	0.42	0.76	1.18	—	3,369	3,369	0.13	0.11	1.40	3,408
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.21	1.19	2.14	2.62	< 0.005	0.08	0.39	0.47	0.08	0.14	0.22	—	558	558	0.02	0.02	0.23	564
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Threshold	—	54.0	54.0	—	—	82.0	—	—	54.0	—	—	—	—	—	—	—	—
Unmit.	—	Yes	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	54.0	54.0	—	—	82.0	—	—	54.0	—	—	—	—	—	—	—	—
Unmit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—

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	1.81	1.52	12.0	17.6	0.03	0.44	0.97	1.42	0.41	0.24	0.65	—	4,093	4,093	0.15	0.19	5.72	4,159
2026	111	111	11.3	17.3	0.03	0.39	0.97	1.36	0.36	0.24	0.60	—	4,063	4,063	0.15	0.19	5.34	4,128
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	3.89	3.28	29.8	29.1	0.06	1.23	9.37	10.6	1.14	3.69	4.83	—	6,761	6,761	0.27	0.19	0.15	6,785
2026	1.72	1.44	11.5	16.9	0.03	0.39	0.97	1.36	0.36	0.24	0.60	—	4,013	4,013	0.15	0.19	0.14	4,073
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.65	1.38	11.7	14.3	0.03	0.46	2.13	2.59	0.42	0.76	1.18	—	3,369	3,369	0.13	0.11	1.40	3,408
2026	6.63	6.54	3.64	5.37	0.01	0.13	0.28	0.41	0.12	0.07	0.19	—	1,229	1,229	0.05	0.05	0.67	1,247
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.30	0.25	2.14	2.62	< 0.005	0.08	0.39	0.47	0.08	0.14	0.22	—	558	558	0.02	0.02	0.23	564
2026	1.21	1.19	0.66	0.98	< 0.005	0.02	0.05	0.07	0.02	0.01	0.03	—	203	203	0.01	0.01	0.11	206

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.	7.84	7.62	1.35	17.4	0.02	0.05	1.59	1.64	0.04	0.40	0.45	200	4,618	4,817	20.7	0.37	3,827	9,271
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.17	6.07	1.44	8.04	0.02	0.03	1.59	1.62	0.03	0.40	0.44	200	4,487	4,686	20.7	0.38	3,820	9,135
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.67	6.53	1.07	10.0	0.01	0.04	1.11	1.14	0.03	0.28	0.31	200	3,991	4,191	20.7	0.34	3,822	8,632
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.22	1.19	0.19	1.83	< 0.005	0.01	0.20	0.21	0.01	0.05	0.06	33.1	661	694	3.42	0.06	633	1,429
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	54.0	54.0	—	—	82.0	—	—	54.0	—	—	—	—	—	—	—	—	—
Unmit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	54.0	54.0	—	—	82.0	—	—	54.0	—	—	—	—	—	—	—	—	—
Unmit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Threshold	—	10.0	10.0	—	—	15.0	—	—	10.0	—	—	—	—	—	—	—	—
Unmit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—

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	1.08	0.99	1.08	8.11	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,922	1,922	0.08	0.09	7.82	1,959
Area	6.74	6.61	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Energy	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	2,482	2,482	0.39	0.04	—	2,505
Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	7.84	7.62	1.35	17.4	0.02	0.05	1.59	1.64	0.04	0.40	0.45	200	4,618	4,817	20.7	0.37	3,827	9,271
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.04	0.95	1.25	7.88	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,828	1,828	0.09	0.10	0.20	1,861
Area	5.11	5.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	2,482	2,482	0.39	0.04	—	2,505
Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	6.17	6.07	1.44	8.04	0.02	0.03	1.59	1.62	0.03	0.40	0.44	200	4,487	4,686	20.7	0.38	3,820	9,135
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.73	0.67	0.84	5.37	0.01	0.01	1.11	1.12	0.01	0.28	0.29	—	1,314	1,314	0.06	0.07	2.41	1,339

Area	5.91	5.85	0.04	4.51	< 0.005	0.01	—	0.01	0.01	—	0.01	—	18.5	18.5	< 0.005	< 0.005	—	18.6
Energy	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	2,482	2,482	0.39	0.04	—	2,505
Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	6.67	6.53	1.07	10.0	0.01	0.04	1.11	1.14	0.03	0.28	0.31	200	3,991	4,191	20.7	0.34	3,822	8,632
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.13	0.12	0.15	0.98	< 0.005	< 0.005	0.20	0.20	< 0.005	0.05	0.05	—	218	218	0.01	0.01	0.40	222
Area	1.08	1.07	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08
Energy	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	411	411	0.06	0.01	—	415
Water	—	—	—	—	—	—	—	—	—	—	—	15.4	29.1	44.6	1.59	0.04	—	95.6
Waste	—	—	—	—	—	—	—	—	—	—	—	17.6	0.00	17.6	1.76	0.00	—	61.7
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632
Total	1.22	1.19	0.19	1.83	< 0.005	0.01	0.20	0.21	0.01	0.05	0.06	33.1	661	694	3.42	0.06	633	1,429

3. Construction Emissions Details

3.1. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.80	3.20	29.7	28.3	0.06	1.23	—	1.23	1.14	—	1.14	—	6,599	6,599	0.27	0.05	—	6,622

Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—
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	0.66	0.55	5.12	4.89	0.01	0.21	—	0.21	0.20	—	0.20	—	1,139	1,139	0.05	0.01	—	1,143
Dust From Material Movement	—	—	—	—	—	—	1.59	1.59	—	0.63	0.63	—	—	—	—	—	—	—
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	0.12	0.10	0.93	0.89	< 0.005	0.04	—	0.04	0.04	—	0.04	—	189	189	0.01	< 0.005	—	189
Dust From Material Movement	—	—	—	—	—	—	0.29	0.29	—	0.12	0.12	—	—	—	—	—	—	—
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	0.09	0.08	0.08	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	162	162	0.01	0.01	0.02	164

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.01	0.01	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.2	28.2	< 0.005	< 0.005	0.05	28.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.66	4.66	< 0.005	< 0.005	0.01	4.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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

3.3. 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	0.00	0.00	0.00	0.00	0.00	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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00	0.00	0.00	0.00	0.00	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 Equipm ent	0.73	0.61	5.68	7.09	0.01	0.23	—	0.23	0.22	—	0.22	—	1,304	1,304	0.05	0.01	—	1,309
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 Equipm ent	0.13	0.11	1.04	1.29	< 0.005	0.04	—	0.04	0.04	—	0.04	—	216	216	0.01	< 0.005	—	217
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.39	0.36	0.25	4.08	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	766	766	0.02	0.03	3.25	779
Vendor	0.07	0.04	1.30	0.51	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	929	929	0.04	0.14	2.47	975
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	0.38	0.35	0.33	3.70	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	714	714	0.02	0.03	0.08	724
Vendor	0.07	0.03	1.38	0.53	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	930	930	0.04	0.14	0.06	973
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	0.20	0.19	0.16	1.93	0.00	0.00	0.39	0.39	0.00	0.09	0.09	—	392	392	0.01	0.02	0.76	398
Vendor	0.04	0.02	0.74	0.28	< 0.005	0.01	0.13	0.14	0.01	0.04	0.04	—	506	506	0.02	0.08	0.58	530

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	0.04	0.03	0.03	0.35	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	64.9	64.9	< 0.005	< 0.005	0.13	65.9
Vendor	0.01	< 0.005	0.13	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	83.7	83.7	< 0.005	0.01	0.10	87.7
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. Building Construction (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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
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	0.36	0.30	2.76	3.63	0.01	0.11	—	0.11	0.10	—	0.10	—	671	671	0.03	0.01	—	673

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 Equipm ent	0.07	0.05	0.50	0.66	< 0.005	0.02	—	0.02	0.02	—	0.02	—	111	111	< 0.005	< 0.005	—	111
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.38	0.35	0.24	3.81	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	752	752	0.02	0.03	3.00	764
Vendor	0.07	0.03	1.24	0.49	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	914	914	0.04	0.14	2.35	959
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	0.37	0.33	0.30	3.45	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	701	701	0.02	0.03	0.08	711
Vendor	0.07	0.03	1.31	0.50	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	914	914	0.04	0.14	0.06	957
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	0.08	0.93	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	198	198	0.01	0.01	0.36	201
Vendor	0.02	0.01	0.36	0.14	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	256	256	0.01	0.04	0.28	268
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	0.04	0.04	0.00	0.01	0.01	—	32.8	32.8	< 0.005	< 0.005	0.06	33.3
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	42.4	42.4	< 0.005	0.01	0.05	44.4
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

3.7. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.25	0.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.39	0.54	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
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	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.04	0.65	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	128	128	< 0.005	< 0.005	0.51	130
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.01	0.01	0.00	< 0.005	< 0.005	—	6.59	6.59	< 0.005	< 0.005	0.01	6.69
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	—	1.09	1.09	< 0.005	< 0.005	< 0.005	1.11
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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

Architect ural	111	111	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipm ent	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
Architect ural Coating s	6.07	6.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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 Equipm ent	< 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 ural Coating s	1.11	1.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.05	0.76	0.00	0.00	0.15	0.15	0.00	0.03	0.03	—	150	150	< 0.005	0.01	0.60	153
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

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	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.75	7.75	< 0.005	< 0.005	0.01	7.87
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	—	1.28	1.28	< 0.005	< 0.005	< 0.005	1.30
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.51	0.47	0.52	3.87	0.01	0.01	0.76	0.77	0.01	0.19	0.20	—	917	917	0.04	0.04	3.73	935

Unrefrig erated Wareho use-No	0.56	0.52	0.57	4.24	0.01	0.01	0.83	0.84	0.01	0.21	0.22	—	1,005	1,005	0.04	0.05	4.09	1,024
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	1.08	0.99	1.08	8.11	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,922	1,922	0.08	0.09	7.82	1,959
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refriger ated Wareho use-No Rail	0.50	0.45	0.60	3.76	0.01	0.01	0.76	0.77	0.01	0.19	0.20	—	872	872	0.04	0.05	0.10	888
Unrefrig erated Wareho use-No Rail	0.54	0.50	0.65	4.12	0.01	0.01	0.83	0.84	0.01	0.21	0.22	—	956	956	0.05	0.05	0.11	973
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	1.04	0.95	1.25	7.88	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,828	1,828	0.09	0.10	0.20	1,861
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refriger ated Wareho use-No Rail	0.06	0.06	0.07	0.47	< 0.005	< 0.005	0.10	0.10	< 0.005	0.02	0.03	—	104	104	< 0.005	0.01	0.19	106
Unrefrig erated Wareho use-No Rail	0.07	0.06	0.08	0.51	< 0.005	< 0.005	0.11	0.11	< 0.005	0.03	0.03	—	114	114	0.01	0.01	0.21	116
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	0.13	0.12	0.15	0.98	< 0.005	< 0.005	0.20	0.20	< 0.005	0.05	0.05	—	218	218	0.01	0.01	0.40	222

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,843	1,843	0.30	0.04	—	1,861
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	378	378	0.06	0.01	—	382
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	40.5	40.5	0.01	< 0.005	—	40.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,262	2,262	0.37	0.04	—	2,284
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,843	1,843	0.30	0.04	—	1,861
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	378	378	0.06	0.01	—	382
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	40.5	40.5	0.01	< 0.005	—	40.9

Total	—	—	—	—	—	—	—	—	—	—	—	—	2,262	2,262	0.37	0.04	—	2,284
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	305	305	0.05	0.01	—	308
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	62.5	62.5	0.01	< 0.005	—	63.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	6.70	6.70	< 0.005	< 0.005	—	6.77
Total	—	—	—	—	—	—	—	—	—	—	—	—	374	374	0.06	0.01	—	378

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	92.5	92.5	0.01	< 0.005	—	92.7
Unrefrigerated Warehouse-No Rail	0.01	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	128	128	0.01	< 0.005	—	129
Parking Lot	0.00	0.00	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	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	221	221	0.02	< 0.005	—	221

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	92.5	92.5	0.01	< 0.005	—	92.7
Unrefrigerated Warehouse-No Rail	0.01	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	128	128	0.01	< 0.005	—	129
Parking Lot	0.00	0.00	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	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	221	221	0.02	< 0.005	—	221
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.3	15.3	< 0.005	< 0.005	—	15.4
Unrefrigerated Warehouse-No Rail	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	21.3	21.3	< 0.005	< 0.005	—	21.3
Parking Lot	0.00	0.00	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	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	36.6	36.6	< 0.005	< 0.005	—	36.7

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	4.51	4.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.61	0.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.63	1.50	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Total	6.74	6.61	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	4.51	4.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.61	0.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	5.11	5.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.82	0.82	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape	0.15	0.14	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08
Total	1.08	1.07	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	63.5	120	183	6.53	0.16	—	394
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	29.7	56.0	85.7	3.05	0.07	—	184
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	63.5	120	183	6.53	0.16	—	394

Unrefrig erated Wareho Rail	—	—	—	—	—	—	—	—	—	—	—	29.7	56.0	85.7	3.05	0.07	—	184
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refriger ated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	10.5	19.9	30.4	1.08	0.03	—	65.2
Unrefrig erated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	4.91	9.27	14.2	0.50	0.01	—	30.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	15.4	29.1	44.6	1.59	0.04	—	95.6

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refriger ated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	72.6	0.00	72.6	7.26	0.00	—	254

Unrefrig Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	33.9	0.00	33.9	3.39	0.00	—	119
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	72.6	0.00	72.6	7.26	0.00	—	254
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	33.9	0.00	33.9	3.39	0.00	—	119
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	12.0	0.00	12.0	1.20	0.00	—	42.1
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	5.61	0.00	5.61	0.56	0.00	—	19.6
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	17.6	0.00	17.6	1.76	0.00	—	61.7

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632

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)

Equipm ent 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. 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)

Equipm ent 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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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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)

Equipm ent 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)

Vegetati on	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequest ered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequest ered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Grading	Grading	1/1/2025	3/28/2025	5.00	63.0	—
Building Construction	Building Construction	3/29/2025	5/23/2026	5.00	300	—
Paving	Paving	5/24/2026	6/21/2026	5.00	20.0	—
Architectural Coating	Architectural Coating	6/22/2026	7/20/2026	5.00	20.0	—

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
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/Back hoes	Diesel	Average	2.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
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/Back hoes	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
Grading	—	—	—	—
Grading	Worker	20.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	88.3	11.7	LDA,LDT1,LDT2
Building Construction	Vendor	34.5	8.40	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	17.7	11.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.40	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

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	315,341	105,114	4,963

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Grading	—	—	189	0.00	—
Paving	0.00	0.00	0.00	0.00	1.90

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Refrigerated Warehouse-No Rail	0.00	0%
Unrefrigerated Warehouse-No Rail	0.00	0%
Parking Lot	1.16	100%
Parking Lot	0.74	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	204	0.03	< 0.005
2026	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VM/Weekday	VM/Saturday	VM/Sunday	VM/Year
Refrigerated Warehouse-No Rail	104	0.00	0.00	27,115	1,064	0.00	0.00	277,441
Unrefrigerated Warehouse-No Rail	114	0.00	0.00	29,720	1,166	0.00	0.00	304,104
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

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	315,341	105,114	4,963

5.10.3. Landscape Equipment

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)
Refrigerated Warehouse-No Rail	3,298,193	204	0.0330	0.0040	288,569
Unrefrigerated Warehouse-No Rail	676,021	204	0.0330	0.0040	400,564
Parking Lot	44,302	204	0.0330	0.0040	0.00
Parking Lot	28,161	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Refrigerated Warehouse-No Rail	33,140,900	0.00
Unrefrigerated Warehouse-No Rail	15,474,094	0.00
Parking Lot	0.00	0.00
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Refrigerated Warehouse-No Rail	135	—
Unrefrigerated Warehouse-No Rail	62.9	—
Parking Lot	0.00	—
Parking Lot	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
Refrigerated Warehouse-No Rail	Cold storage	R-404A	3,922	7.50	7.50	7.50	25.0

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
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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
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5.16.2. Process Boilers

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

Equipment Type	Fuel Type
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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
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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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	11.8	annual days of extreme heat
Extreme Precipitation	5.65	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	16.4	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 $\frac{3}{4}$ 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	N/A	N/A	N/A	N/A
Extreme Precipitation	2	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	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	N/A	N/A	N/A	N/A
Extreme Precipitation	2	1	1	3
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
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	16.8
AQ-PM	35.7
AQ-DPM	23.4
Drinking Water	69.2
Lead Risk Housing	55.8
Pesticides	66.2
Toxic Releases	61.2
Traffic	83.3
Effect Indicators	—
CleanUp Sites	62.4
Groundwater	0.00
Haz Waste Facilities/Generators	82.7
Impaired Water Bodies	23.9
Solid Waste	83.9
Sensitive Population	—
Asthma	71.9

Cardio-vascular	67.0
Low Birth Weights	51.0
Socioeconomic Factor Indicators	—
Education	62.0
Housing	12.0
Linguistic	39.2
Poverty	33.8
Unemployment	36.4

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	80.85461311
Employed	75.23418452
Median HI	74.554087
Education	—
Bachelor's or higher	69.35711536
High school enrollment	100
Preschool enrollment	12.62671628
Transportation	—
Auto Access	83.51084306
Active commuting	27.38354934
Social	—
2-parent households	62.7229565
Voting	57.75696138
Neighborhood	—
Alcohol availability	76.10676248

Park access	56.71756705
Retail density	24.22687027
Supermarket access	27.9481586
Tree canopy	22.44321827
Housing	—
Homeownership	87.02681894
Housing habitability	96.41986398
Low-inc homeowner severe housing cost burden	70.11420506
Low-inc renter severe housing cost burden	97.06146542
Uncrowded housing	60.05389452
Health Outcomes	—
Insured adults	79.19928141
Arthritis	0.0
Asthma ER Admissions	56.0
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	25.5
Cognitively Disabled	20.1
Physically Disabled	17.3
Heart Attack ER Admissions	55.3
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6

Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	43.5
Children	32.5
Elderly	69.3
English Speaking	60.5
Foreign-born	72.3
Outdoor Workers	52.3
Climate Change Adaptive Capacity	—
Impervious Surface Cover	43.7
Traffic Density	45.1
Traffic Access	23.0
Other Indices	—
Hardship	34.8
Other Decision Support	—
2016 Voting	51.4

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	63.0
Healthy Places Index Score for Project Location (b)	73.0
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	Per project description of Building A and B
Construction: Construction Phases	Per model
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Wine Warehouse Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Wine Warehouse
Construction Start Date	1/1/2025
Operational Year	2025
Lead Agency	Napa County PBES
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.60
Precipitation (days)	38.4
Location	Morris Ct & Technology Way, California 94558, USA
County	Napa
City	Unincorporated
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	801
EDFZ	2
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

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
Refrigerated Warehouse-No Rail	143	1000sqft	13.2	143,312	—	—	—	Building A

Unrefrigerated Warehouse-No Rail	66.9	1000sqft	6.87	66,915	—	—	—	Building B
Parking Lot	129	Space	1.16	0.00	—	—	—	Parking Lot For Building A
Parking Lot	82.0	Space	0.74	0.00	—	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-13	Use Low-VOC Paints for Construction

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.	111	111	12.0	17.6	0.03	0.44	0.97	1.42	0.41	0.24	0.65	—	4,093	4,093	0.15	0.19	5.72	4,159
Mit.	50.1	50.1	12.0	17.6	0.03	0.44	0.97	1.42	0.41	0.24	0.65	—	4,093	4,093	0.15	0.19	5.72	4,159
% Reduced	55%	55%	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.89	3.28	29.8	29.1	0.06	1.23	9.37	10.6	1.14	3.69	4.83	—	6,761	6,761	0.27	0.19	0.15	6,785
Mit.	3.89	3.28	29.8	29.1	0.06	1.23	9.37	10.6	1.14	3.69	4.83	—	6,761	6,761	0.27	0.19	0.15	6,785
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.63	6.54	11.7	14.3	0.03	0.46	2.13	2.59	0.42	0.76	1.18	—	3,369	3,369	0.13	0.11	1.40	3,408
Mit.	3.29	3.20	11.7	14.3	0.03	0.46	2.13	2.59	0.42	0.76	1.18	—	3,369	3,369	0.13	0.11	1.40	3,408
% Reduced	50%	51%	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.21	1.19	2.14	2.62	< 0.005	0.08	0.39	0.47	0.08	0.14	0.22	—	558	558	0.02	0.02	0.23	564
Mit.	0.60	0.58	2.14	2.62	< 0.005	0.08	0.39	0.47	0.08	0.14	0.22	—	558	558	0.02	0.02	0.23	564
% Reduced	50%	51%	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	54.0	54.0	—	—	82.0	—	—	54.0	—	—	—	—	—	—	—	—	—
Unmit.	—	Yes	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—
Mit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	54.0	54.0	—	—	82.0	—	—	54.0	—	—	—	—	—	—	—	—	—
Unmit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—
Mit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—

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	1.81	1.52	12.0	17.6	0.03	0.44	0.97	1.42	0.41	0.24	0.65	—	4,093	4,093	0.15	0.19	5.72	4,159
2026	111	111	11.3	17.3	0.03	0.39	0.97	1.36	0.36	0.24	0.60	—	4,063	4,063	0.15	0.19	5.34	4,128
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	3.89	3.28	29.8	29.1	0.06	1.23	9.37	10.6	1.14	3.69	4.83	—	6,761	6,761	0.27	0.19	0.15	6,785
2026	1.72	1.44	11.5	16.9	0.03	0.39	0.97	1.36	0.36	0.24	0.60	—	4,013	4,013	0.15	0.19	0.14	4,073
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.65	1.38	11.7	14.3	0.03	0.46	2.13	2.59	0.42	0.76	1.18	—	3,369	3,369	0.13	0.11	1.40	3,408
2026	6.63	6.54	3.64	5.37	0.01	0.13	0.28	0.41	0.12	0.07	0.19	—	1,229	1,229	0.05	0.05	0.67	1,247
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.30	0.25	2.14	2.62	< 0.005	0.08	0.39	0.47	0.08	0.14	0.22	—	558	558	0.02	0.02	0.23	564
2026	1.21	1.19	0.66	0.98	< 0.005	0.02	0.05	0.07	0.02	0.01	0.03	—	203	203	0.01	0.01	0.11	206

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	1.81	1.52	12.0	17.6	0.03	0.44	0.97	1.42	0.41	0.24	0.65	—	4,093	4,093	0.15	0.19	5.72	4,159
2026	50.1	50.1	11.3	17.3	0.03	0.39	0.97	1.36	0.36	0.24	0.60	—	4,063	4,063	0.15	0.19	5.34	4,128
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	3.89	3.28	29.8	29.1	0.06	1.23	9.37	10.6	1.14	3.69	4.83	—	6,761	6,761	0.27	0.19	0.15	6,785
2026	1.72	1.44	11.5	16.9	0.03	0.39	0.97	1.36	0.36	0.24	0.60	—	4,013	4,013	0.15	0.19	0.14	4,073

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.65	1.38	11.7	14.3	0.03	0.46	2.13	2.59	0.42	0.76	1.18	—	3,369	3,369	0.13	0.11	1.40	3,408
2026	3.29	3.20	3.64	5.37	0.01	0.13	0.28	0.41	0.12	0.07	0.19	—	1,229	1,229	0.05	0.05	0.67	1,247
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.30	0.25	2.14	2.62	< 0.005	0.08	0.39	0.47	0.08	0.14	0.22	—	558	558	0.02	0.02	0.23	564
2026	0.60	0.58	0.66	0.98	< 0.005	0.02	0.05	0.07	0.02	0.01	0.03	—	203	203	0.01	0.01	0.11	206

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.	7.84	7.62	1.35	17.4	0.02	0.05	1.59	1.64	0.04	0.40	0.45	200	4,618	4,817	20.7	0.37	3,827	9,271
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.17	6.07	1.44	8.04	0.02	0.03	1.59	1.62	0.03	0.40	0.44	200	4,487	4,686	20.7	0.38	3,820	9,135
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.67	6.53	1.07	10.0	0.01	0.04	1.11	1.14	0.03	0.28	0.31	200	3,991	4,191	20.7	0.34	3,822	8,632
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.22	1.19	0.19	1.83	< 0.005	0.01	0.20	0.21	0.01	0.05	0.06	33.1	661	694	3.42	0.06	633	1,429
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	54.0	54.0	—	—	82.0	—	—	54.0	—	—	—	—	—	—	—	—	—
Unmit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—

Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	54.0	54.0	—	—	82.0	—	—	54.0	—	—	—	—	—	—	—	—	—
Unmit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	10.0	10.0	—	—	15.0	—	—	10.0	—	—	—	—	—	—	—	—	—
Unmit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—

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	1.08	0.99	1.08	8.11	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,922	1,922	0.08	0.09	7.82	1,959
Area	6.74	6.61	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Energy	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	2,482	2,482	0.39	0.04	—	2,505
Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	7.84	7.62	1.35	17.4	0.02	0.05	1.59	1.64	0.04	0.40	0.45	200	4,618	4,817	20.7	0.37	3,827	9,271
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.04	0.95	1.25	7.88	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,828	1,828	0.09	0.10	0.20	1,861
Area	5.11	5.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	2,482	2,482	0.39	0.04	—	2,505

Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	6.17	6.07	1.44	8.04	0.02	0.03	1.59	1.62	0.03	0.40	0.44	200	4,487	4,686	20.7	0.38	3,820	9,135
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.73	0.67	0.84	5.37	0.01	0.01	1.11	1.12	0.01	0.28	0.29	—	1,314	1,314	0.06	0.07	2.41	1,339
Area	5.91	5.85	0.04	4.51	< 0.005	0.01	—	0.01	0.01	—	0.01	—	18.5	18.5	< 0.005	< 0.005	—	18.6
Energy	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	2,482	2,482	0.39	0.04	—	2,505
Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	6.67	6.53	1.07	10.0	0.01	0.04	1.11	1.14	0.03	0.28	0.31	200	3,991	4,191	20.7	0.34	3,822	8,632
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.13	0.12	0.15	0.98	< 0.005	< 0.005	0.20	0.20	< 0.005	0.05	0.05	—	218	218	0.01	0.01	0.40	222
Area	1.08	1.07	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08
Energy	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	411	411	0.06	0.01	—	415
Water	—	—	—	—	—	—	—	—	—	—	—	15.4	29.1	44.6	1.59	0.04	—	95.6
Waste	—	—	—	—	—	—	—	—	—	—	—	17.6	0.00	17.6	1.76	0.00	—	61.7
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632
Total	1.22	1.19	0.19	1.83	< 0.005	0.01	0.20	0.21	0.01	0.05	0.06	33.1	661	694	3.42	0.06	633	1,429

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	1.08	0.99	1.08	8.11	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,922	1,922	0.08	0.09	7.82	1,959

Area	6.74	6.61	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Energy	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	2,482	2,482	0.39	0.04	—	2,505
Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	7.84	7.62	1.35	17.4	0.02	0.05	1.59	1.64	0.04	0.40	0.45	200	4,618	4,817	20.7	0.37	3,827	9,271
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.04	0.95	1.25	7.88	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,828	1,828	0.09	0.10	0.20	1,861
Area	5.11	5.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	2,482	2,482	0.39	0.04	—	2,505
Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	6.17	6.07	1.44	8.04	0.02	0.03	1.59	1.62	0.03	0.40	0.44	200	4,487	4,686	20.7	0.38	3,820	9,135
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.73	0.67	0.84	5.37	0.01	0.01	1.11	1.12	0.01	0.28	0.29	—	1,314	1,314	0.06	0.07	2.41	1,339
Area	5.91	5.85	0.04	4.51	< 0.005	0.01	—	0.01	0.01	—	0.01	—	18.5	18.5	< 0.005	< 0.005	—	18.6
Energy	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	2,482	2,482	0.39	0.04	—	2,505
Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	6.67	6.53	1.07	10.0	0.01	0.04	1.11	1.14	0.03	0.28	0.31	200	3,991	4,191	20.7	0.34	3,822	8,632
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.13	0.12	0.15	0.98	< 0.005	< 0.005	0.20	0.20	< 0.005	0.05	0.05	—	218	218	0.01	0.01	0.40	222
Area	1.08	1.07	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08
Energy	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	411	411	0.06	0.01	—	415

Water	—	—	—	—	—	—	—	—	—	—	—	15.4	29.1	44.6	1.59	0.04	—	95.6
Waste	—	—	—	—	—	—	—	—	—	—	—	17.6	0.00	17.6	1.76	0.00	—	61.7
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632
Total	1.22	1.19	0.19	1.83	< 0.005	0.01	0.20	0.21	0.01	0.05	0.06	33.1	661	694	3.42	0.06	633	1,429

3. Construction Emissions Details

3.1. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.80	3.20	29.7	28.3	0.06	1.23	—	1.23	1.14	—	1.14	—	6,599	6,599	0.27	0.05	—	6,622
Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—
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	0.66	0.55	5.12	4.89	0.01	0.21	—	0.21	0.20	—	0.20	—	1,139	1,139	0.05	0.01	—	1,143

Dust From Material Movement	—	—	—	—	—	—	1.59	1.59	—	0.63	0.63	—	—	—	—	—	—	—
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	0.12	0.10	0.93	0.89	< 0.005	0.04	—	0.04	0.04	—	0.04	—	189	189	0.01	< 0.005	—	189
Dust From Material Movement	—	—	—	—	—	—	0.29	0.29	—	0.12	0.12	—	—	—	—	—	—	—
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	0.09	0.08	0.08	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	162	162	0.01	0.01	0.02	164
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.01	0.01	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.2	28.2	< 0.005	< 0.005	0.05	28.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.66	4.66	< 0.005	< 0.005	0.01	4.74

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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

3.2. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.80	3.20	29.7	28.3	0.06	1.23	—	1.23	1.14	—	1.14	—	6,599	6,599	0.27	0.05	—	6,622
Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—
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	0.66	0.55	5.12	4.89	0.01	0.21	—	0.21	0.20	—	0.20	—	1,139	1,139	0.05	0.01	—	1,143
Dust From Material Movement	—	—	—	—	—	—	1.59	1.59	—	0.63	0.63	—	—	—	—	—	—	—
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	0.12	0.10	0.93	0.89	< 0.005	0.04	—	0.04	0.04	—	0.04	—	189	189	0.01	< 0.005	—	189
Dust From Material Movement	—	—	—	—	—	—	0.29	0.29	—	0.12	0.12	—	—	—	—	—	—	—
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	0.09	0.08	0.08	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	162	162	0.01	0.01	0.02	164
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.01	0.01	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.2	28.2	< 0.005	< 0.005	0.05	28.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.66	4.66	< 0.005	< 0.005	0.01	4.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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

3.3. 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	0.00	0.00	0.00	0.00	0.00	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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00	0.00	0.00	0.00	0.00	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	0.73	0.61	5.68	7.09	0.01	0.23	—	0.23	0.22	—	0.22	—	1,304	1,304	0.05	0.01	—	1,309
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	0.13	0.11	1.04	1.29	< 0.005	0.04	—	0.04	0.04	—	0.04	—	216	216	0.01	< 0.005	—	217
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.39	0.36	0.25	4.08	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	766	766	0.02	0.03	3.25	779
Vendor	0.07	0.04	1.30	0.51	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	929	929	0.04	0.14	2.47	975
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	0.38	0.35	0.33	3.70	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	714	714	0.02	0.03	0.08	724
Vendor	0.07	0.03	1.38	0.53	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	930	930	0.04	0.14	0.06	973
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	0.20	0.19	0.16	1.93	0.00	0.00	0.39	0.39	0.00	0.09	0.09	—	392	392	0.01	0.02	0.76	398
Vendor	0.04	0.02	0.74	0.28	< 0.005	0.01	0.13	0.14	0.01	0.04	0.04	—	506	506	0.02	0.08	0.58	530
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	0.04	0.03	0.03	0.35	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	64.9	64.9	< 0.005	< 0.005	0.13	65.9
Vendor	0.01	< 0.005	0.13	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	83.7	83.7	< 0.005	0.01	0.10	87.7
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. 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	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	0.00	0.00	0.00	0.00	0.00	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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00	0.00	0.00	0.00	0.00	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	0.73	0.61	5.68	7.09	0.01	0.23	—	0.23	0.22	—	0.22	—	1,304	1,304	0.05	0.01	—	1,309
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	0.13	0.11	1.04	1.29	< 0.005	0.04	—	0.04	0.04	—	0.04	—	216	216	0.01	< 0.005	—	217
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.39	0.36	0.25	4.08	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	766	766	0.02	0.03	3.25	779
Vendor	0.07	0.04	1.30	0.51	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	929	929	0.04	0.14	2.47	975
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	0.38	0.35	0.33	3.70	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	714	714	0.02	0.03	0.08	724
Vendor	0.07	0.03	1.38	0.53	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	930	930	0.04	0.14	0.06	973
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	0.20	0.19	0.16	1.93	0.00	0.00	0.39	0.39	0.00	0.09	0.09	—	392	392	0.01	0.02	0.76	398
Vendor	0.04	0.02	0.74	0.28	< 0.005	0.01	0.13	0.14	0.01	0.04	0.04	—	506	506	0.02	0.08	0.58	530
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	0.04	0.03	0.03	0.35	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	64.9	64.9	< 0.005	< 0.005	0.13	65.9
Vendor	0.01	< 0.005	0.13	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	83.7	83.7	< 0.005	0.01	0.10	87.7
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. Building Construction (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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
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	0.36	0.30	2.76	3.63	0.01	0.11	—	0.11	0.10	—	0.10	—	671	671	0.03	0.01	—	673
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	0.07	0.05	0.50	0.66	< 0.005	0.02	—	0.02	0.02	—	0.02	—	111	111	< 0.005	< 0.005	—	111
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.38	0.35	0.24	3.81	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	752	752	0.02	0.03	3.00	764
Vendor	0.07	0.03	1.24	0.49	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	914	914	0.04	0.14	2.35	959
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	0.37	0.33	0.30	3.45	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	701	701	0.02	0.03	0.08	711
Vendor	0.07	0.03	1.31	0.50	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	914	914	0.04	0.14	0.06	957
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	0.08	0.93	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	198	198	0.01	0.01	0.36	201
Vendor	0.02	0.01	0.36	0.14	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	256	256	0.01	0.04	0.28	268
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	0.04	0.04	0.00	0.01	0.01	—	32.8	32.8	< 0.005	< 0.005	0.06	33.3
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	42.4	42.4	< 0.005	0.01	0.05	44.4
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

3.6. Building Construction (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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
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	0.36	0.30	2.76	3.63	0.01	0.11	—	0.11	0.10	—	0.10	—	671	671	0.03	0.01	—	673
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	0.07	0.05	0.50	0.66	< 0.005	0.02	—	0.02	0.02	—	0.02	—	111	111	< 0.005	< 0.005	—	111
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.38	0.35	0.24	3.81	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	752	752	0.02	0.03	3.00	764
Vendor	0.07	0.03	1.24	0.49	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	914	914	0.04	0.14	2.35	959
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	0.37	0.33	0.30	3.45	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	701	701	0.02	0.03	0.08	711
Vendor	0.07	0.03	1.31	0.50	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	914	914	0.04	0.14	0.06	957
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	0.08	0.93	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	198	198	0.01	0.01	0.36	201
Vendor	0.02	0.01	0.36	0.14	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	256	256	0.01	0.04	0.28	268
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	0.04	0.04	0.00	0.01	0.01	—	32.8	32.8	< 0.005	< 0.005	0.06	33.3
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	42.4	42.4	< 0.005	0.01	0.05	44.4

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
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3.7. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.25	0.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.39	0.54	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
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	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.04	0.65	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	128	128	< 0.005	< 0.005	0.51	130
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.01	0.01	0.00	< 0.005	< 0.005	—	6.59	6.59	< 0.005	< 0.005	0.01	6.69
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	—	1.09	1.09	< 0.005	< 0.005	< 0.005	1.11
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm ent	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	0.25	0.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipm ent	0.05	0.04	0.39	0.54	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
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 Equipm ent	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.04	0.65	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	128	128	< 0.005	< 0.005	0.51	130
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.01	0.01	0.00	< 0.005	< 0.005	—	6.59	6.59	< 0.005	< 0.005	0.01	6.69
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	—	1.09	1.09	< 0.005	< 0.005	< 0.005	1.11
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	111	111	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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	6.07	6.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22
Architectural Coatings	1.11	1.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.05	0.76	0.00	0.00	0.15	0.15	0.00	0.03	0.03	—	150	150	< 0.005	0.01	0.60	153
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.75	7.75	< 0.005	< 0.005	0.01	7.87

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	—	1.28	1.28	< 0.005	< 0.005	< 0.005	1.30
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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

3.10. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	49.9	49.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	2.73	2.73	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22
Architectural Coatings	0.50	0.50	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.05	0.76	0.00	0.00	0.15	0.15	0.00	0.03	0.03	—	150	150	< 0.005	0.01	0.60	153
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.75	7.75	< 0.005	< 0.005	0.01	7.87
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	—	1.28	1.28	< 0.005	< 0.005	< 0.005	1.30
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.51	0.47	0.52	3.87	0.01	0.01	0.76	0.77	0.01	0.19	0.20	—	917	917	0.04	0.04	3.73	935
Unrefrigerated Warehouse-No Rail	0.56	0.52	0.57	4.24	0.01	0.01	0.83	0.84	0.01	0.21	0.22	—	1,005	1,005	0.04	0.05	4.09	1,024
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	1.08	0.99	1.08	8.11	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,922	1,922	0.08	0.09	7.82	1,959
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.50	0.45	0.60	3.76	0.01	0.01	0.76	0.77	0.01	0.19	0.20	—	872	872	0.04	0.05	0.10	888

Unrefrigerated Warehouse-No Rail	0.54	0.50	0.65	4.12	0.01	0.01	0.83	0.84	0.01	0.21	0.22	—	956	956	0.05	0.05	0.11	973
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	1.04	0.95	1.25	7.88	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,828	1,828	0.09	0.10	0.20	1,861
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.06	0.06	0.07	0.47	< 0.005	< 0.005	0.10	0.10	< 0.005	0.02	0.03	—	104	104	< 0.005	0.01	0.19	106
Unrefrigerated Warehouse-No Rail	0.07	0.06	0.08	0.51	< 0.005	< 0.005	0.11	0.11	< 0.005	0.03	0.03	—	114	114	0.01	0.01	0.21	116
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	0.13	0.12	0.15	0.98	< 0.005	< 0.005	0.20	0.20	< 0.005	0.05	0.05	—	218	218	0.01	0.01	0.40	222

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.51	0.47	0.52	3.87	0.01	0.01	0.76	0.77	0.01	0.19	0.20	—	917	917	0.04	0.04	3.73	935

Unrefrig erated	0.56	0.52	0.57	4.24	0.01	0.01	0.83	0.84	0.01	0.21	0.22	—	1,005	1,005	0.04	0.05	4.09	1,024
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	1.08	0.99	1.08	8.11	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,922	1,922	0.08	0.09	7.82	1,959
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refriger ated Wareho use-No Rail	0.50	0.45	0.60	3.76	0.01	0.01	0.76	0.77	0.01	0.19	0.20	—	872	872	0.04	0.05	0.10	888
Unrefrig erated Wareho use-No Rail	0.54	0.50	0.65	4.12	0.01	0.01	0.83	0.84	0.01	0.21	0.22	—	956	956	0.05	0.05	0.11	973
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	1.04	0.95	1.25	7.88	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,828	1,828	0.09	0.10	0.20	1,861
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refriger ated Wareho use-No Rail	0.06	0.06	0.07	0.47	< 0.005	< 0.005	0.10	0.10	< 0.005	0.02	0.03	—	104	104	< 0.005	0.01	0.19	106
Unrefrig erated Wareho use-No Rail	0.07	0.06	0.08	0.51	< 0.005	< 0.005	0.11	0.11	< 0.005	0.03	0.03	—	114	114	0.01	0.01	0.21	116
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	0.13	0.12	0.15	0.98	< 0.005	< 0.005	0.20	0.20	< 0.005	0.05	0.05	—	218	218	0.01	0.01	0.40	222

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,843	1,843	0.30	0.04	—	1,861
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	378	378	0.06	0.01	—	382
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	40.5	40.5	0.01	< 0.005	—	40.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,262	2,262	0.37	0.04	—	2,284
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,843	1,843	0.30	0.04	—	1,861
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	378	378	0.06	0.01	—	382
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	40.5	40.5	0.01	< 0.005	—	40.9

Total	—	—	—	—	—	—	—	—	—	—	—	—	2,262	2,262	0.37	0.04	—	2,284
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	305	305	0.05	0.01	—	308
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	62.5	62.5	0.01	< 0.005	—	63.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	6.70	6.70	< 0.005	< 0.005	—	6.77
Total	—	—	—	—	—	—	—	—	—	—	—	—	374	374	0.06	0.01	—	378

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,843	1,843	0.30	0.04	—	1,861
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	378	378	0.06	0.01	—	382
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	40.5	40.5	0.01	< 0.005	—	40.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,262	2,262	0.37	0.04	—	2,284

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,843	1,843	0.30	0.04	—	1,861
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	378	378	0.06	0.01	—	382
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	40.5	40.5	0.01	< 0.005	—	40.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,262	2,262	0.37	0.04	—	2,284
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	305	305	0.05	0.01	—	308
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	62.5	62.5	0.01	< 0.005	—	63.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	6.70	6.70	< 0.005	< 0.005	—	6.77
Total	—	—	—	—	—	—	—	—	—	—	—	—	374	374	0.06	0.01	—	378

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	92.5	92.5	0.01	< 0.005	—	92.7
Unrefrigerated Warehouse-No Rail	0.01	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	128	128	0.01	< 0.005	—	129
Parking Lot	0.00	0.00	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	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	221	221	0.02	< 0.005	—	221
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	92.5	92.5	0.01	< 0.005	—	92.7
Unrefrigerated Warehouse-No Rail	0.01	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	128	128	0.01	< 0.005	—	129
Parking Lot	0.00	0.00	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	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	221	221	0.02	< 0.005	—	221
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.3	15.3	< 0.005	< 0.005	—	15.4

Unrefrig Warehouse-No Rail	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	21.3	21.3	< 0.005	< 0.005	—	21.3
Parking Lot	0.00	0.00	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	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	36.6	36.6	< 0.005	< 0.005	—	36.7

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	92.5	92.5	0.01	< 0.005	—	92.7
Unrefrigerated Warehouse-No Rail	0.01	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	128	128	0.01	< 0.005	—	129
Parking Lot	0.00	0.00	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	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	221	221	0.02	< 0.005	—	221
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	92.5	92.5	0.01	< 0.005	—	92.7

Unrefrig erated	0.01	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	128	128	0.01	< 0.005	—	129
Parking Lot	0.00	0.00	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	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	221	221	0.02	< 0.005	—	221
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehous e-No Rail	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.3	15.3	< 0.005	< 0.005	—	15.4
Unrefrig erated Warehous e-No Rail	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	21.3	21.3	< 0.005	< 0.005	—	21.3
Parking Lot	0.00	0.00	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	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	36.6	36.6	< 0.005	< 0.005	—	36.7

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	4.51	4.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coatings	0.61	0.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.63	1.50	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Total	6.74	6.61	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	4.51	4.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.61	0.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	5.11	5.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.82	0.82	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.15	0.14	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08
Total	1.08	1.07	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08

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	4.51	4.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.61	0.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.63	1.50	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Total	6.74	6.61	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	4.51	4.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.61	0.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	5.11	5.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.82	0.82	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coating	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.15	0.14	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08
Total	1.08	1.07	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	63.5	120	183	6.53	0.16	—	394
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	29.7	56.0	85.7	3.05	0.07	—	184
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated Warehouse Rail	—	—	—	—	—	—	—	—	—	—	—	63.5	120	183	6.53	0.16	—	394
Unrefrigerated Warehouse use-No Rail	—	—	—	—	—	—	—	—	—	—	—	29.7	56.0	85.7	3.05	0.07	—	184
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse use-No Rail	—	—	—	—	—	—	—	—	—	—	—	10.5	19.9	30.4	1.08	0.03	—	65.2
Unrefrigerated Warehouse use-No Rail	—	—	—	—	—	—	—	—	—	—	—	4.91	9.27	14.2	0.50	0.01	—	30.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	15.4	29.1	44.6	1.59	0.04	—	95.6

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated Warehouse Rail	—	—	—	—	—	—	—	—	—	—	—	63.5	120	183	6.53	0.16	—	394
Unrefrigerated Warehouse use-No Rail	—	—	—	—	—	—	—	—	—	—	—	29.7	56.0	85.7	3.05	0.07	—	184
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse use-No Rail	—	—	—	—	—	—	—	—	—	—	—	63.5	120	183	6.53	0.16	—	394
Unrefrigerated Warehouse use-No Rail	—	—	—	—	—	—	—	—	—	—	—	29.7	56.0	85.7	3.05	0.07	—	184
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse use-No Rail	—	—	—	—	—	—	—	—	—	—	—	10.5	19.9	30.4	1.08	0.03	—	65.2

Unrefrig erated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	4.91	9.27	14.2	0.50	0.01	—	30.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	15.4	29.1	44.6	1.59	0.04	—	95.6

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	72.6	0.00	72.6	7.26	0.00	—	254
Unrefrig erated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	33.9	0.00	33.9	3.39	0.00	—	119
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated Warehouse Rail	—	—	—	—	—	—	—	—	—	—	—	72.6	0.00	72.6	7.26	0.00	—	254
Unrefrigerated Warehouse use-No Rail	—	—	—	—	—	—	—	—	—	—	—	33.9	0.00	33.9	3.39	0.00	—	119
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse use-No Rail	—	—	—	—	—	—	—	—	—	—	—	12.0	0.00	12.0	1.20	0.00	—	42.1
Unrefrigerated Warehouse use-No Rail	—	—	—	—	—	—	—	—	—	—	—	5.61	0.00	5.61	0.56	0.00	—	19.6
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	17.6	0.00	17.6	1.76	0.00	—	61.7

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated Warehouse Rail	—	—	—	—	—	—	—	—	—	—	—	72.6	0.00	72.6	7.26	0.00	—	254
Unrefrigerated Warehouse use-No Rail	—	—	—	—	—	—	—	—	—	—	—	33.9	0.00	33.9	3.39	0.00	—	119
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse use-No Rail	—	—	—	—	—	—	—	—	—	—	—	72.6	0.00	72.6	7.26	0.00	—	254
Unrefrigerated Warehouse use-No Rail	—	—	—	—	—	—	—	—	—	—	—	33.9	0.00	33.9	3.39	0.00	—	119
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse use-No Rail	—	—	—	—	—	—	—	—	—	—	—	12.0	0.00	12.0	1.20	0.00	—	42.1

Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	5.61	0.00	5.61	0.56	0.00	—	19.6
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	17.6	0.00	17.6	1.76	0.00	—	61.7

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632

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)

Equipm ent 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)

Equipm ent 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. 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)

Equipm ent 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)

Equipm ent 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)

Equipm ent 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)

Equipm ent 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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Grading	Grading	1/1/2025	3/28/2025	5.00	63.0	—
Building Construction	Building Construction	3/29/2025	5/23/2026	5.00	300	—
Paving	Paving	5/24/2026	6/21/2026	5.00	20.0	—
Architectural Coating	Architectural Coating	6/22/2026	7/20/2026	5.00	20.0	—

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
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/Back hoes	Diesel	Average	2.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
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/Back hoes	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

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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/Back hoes	Diesel	Average	2.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
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/Back hoes	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
Grading	—	—	—	—
Grading	Worker	20.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	88.3	11.7	LDA,LDT1,LDT2
Building Construction	Vendor	34.5	8.40	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT

Architectural Coating	—	—	—	—
Architectural Coating	Worker	17.7	11.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.40	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Grading	—	—	—	—
Grading	Worker	20.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	88.3	11.7	LDA,LDT1,LDT2
Building Construction	Vendor	34.5	8.40	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	17.7	11.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.40	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

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	315,341	105,114	4,963

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Grading	—	—	189	0.00	—
Paving	0.00	0.00	0.00	0.00	1.90

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Refrigerated Warehouse-No Rail	0.00	0%
Unrefrigerated Warehouse-No Rail	0.00	0%
Parking Lot	1.16	100%
Parking Lot	0.74	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	204	0.03	< 0.005
2026	0.00	204	0.03	< 0.005

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
Refrigerated Warehouse-No Rail	104	0.00	0.00	27,115	1,064	0.00	0.00	277,441
Unrefrigerated Warehouse-No Rail	114	0.00	0.00	29,720	1,166	0.00	0.00	304,104
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMt/Weekday	VMt/Saturday	VMt/Sunday	VMt/Year
Refrigerated Warehouse-No Rail	104	0.00	0.00	27,115	1,064	0.00	0.00	277,441
Unrefrigerated Warehouse-No Rail	114	0.00	0.00	29,720	1,166	0.00	0.00	304,104
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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	315,341	105,114	4,963

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)
Refrigerated Warehouse-No Rail	3,298,193	204	0.0330	0.0040	288,569
Unrefrigerated Warehouse-No Rail	676,021	204	0.0330	0.0040	400,564
Parking Lot	44,302	204	0.0330	0.0040	0.00
Parking Lot	28,161	204	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)
Refrigerated Warehouse-No Rail	3,298,193	204	0.0330	0.0040	288,569
Unrefrigerated Warehouse-No Rail	676,021	204	0.0330	0.0040	400,564
Parking Lot	44,302	204	0.0330	0.0040	0.00
Parking Lot	28,161	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Refrigerated Warehouse-No Rail	33,140,900	0.00
Unrefrigerated Warehouse-No Rail	15,474,094	0.00
Parking Lot	0.00	0.00
Parking Lot	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Refrigerated Warehouse-No Rail	33,140,900	0.00
Unrefrigerated Warehouse-No Rail	15,474,094	0.00
Parking Lot	0.00	0.00
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Refrigerated Warehouse-No Rail	135	—
Unrefrigerated Warehouse-No Rail	62.9	—
Parking Lot	0.00	—
Parking Lot	0.00	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Refrigerated Warehouse-No Rail	135	—
Unrefrigerated Warehouse-No Rail	62.9	—
Parking Lot	0.00	—
Parking Lot	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
Refrigerated Warehouse-No Rail	Cold storage	R-404A	3,922	7.50	7.50	7.50	25.0

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Refrigerated Warehouse-No Rail	Cold storage	R-404A	3,922	7.50	7.50	7.50	25.0

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
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5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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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
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5.16.2. Process Boilers

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

Equipment Type	Fuel Type
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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
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5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

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

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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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	11.8	annual days of extreme heat
Extreme Precipitation	5.65	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	16.4	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	N/A	N/A	N/A	N/A
Extreme Precipitation	2	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	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	N/A	N/A	N/A	N/A
Extreme Precipitation	2	1	1	3
Sea Level Rise	1	1	1	2

Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
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	16.8
AQ-PM	35.7
AQ-DPM	23.4
Drinking Water	69.2
Lead Risk Housing	55.8
Pesticides	66.2
Toxic Releases	61.2
Traffic	83.3
Effect Indicators	—
CleanUp Sites	62.4
Groundwater	0.00

Haz Waste Facilities/Generators	82.7
Impaired Water Bodies	23.9
Solid Waste	83.9
Sensitive Population	—
Asthma	71.9
Cardio-vascular	67.0
Low Birth Weights	51.0
Socioeconomic Factor Indicators	—
Education	62.0
Housing	12.0
Linguistic	39.2
Poverty	33.8
Unemployment	36.4

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	80.85461311
Employed	75.23418452
Median HI	74.554087
Education	—
Bachelor's or higher	69.35711536
High school enrollment	100
Preschool enrollment	12.62671628
Transportation	—
Auto Access	83.51084306
Active commuting	27.38354934

Social	—
2-parent households	62.7229565
Voting	57.75696138
Neighborhood	—
Alcohol availability	76.10676248
Park access	56.71756705
Retail density	24.22687027
Supermarket access	27.9481586
Tree canopy	22.44321827
Housing	—
Homeownership	87.02681894
Housing habitability	96.41986398
Low-inc homeowner severe housing cost burden	70.11420506
Low-inc renter severe housing cost burden	97.06146542
Uncrowded housing	60.05389452
Health Outcomes	—
Insured adults	79.19928141
Arthritis	0.0
Asthma ER Admissions	56.0
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	25.5
Cognitively Disabled	20.1
Physically Disabled	17.3

Heart Attack ER Admissions	55.3
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	43.5
Children	32.5
Elderly	69.3
English Speaking	60.5
Foreign-born	72.3
Outdoor Workers	52.3
Climate Change Adaptive Capacity	—
Impervious Surface Cover	43.7
Traffic Density	45.1
Traffic Access	23.0
Other Indices	—
Hardship	34.8
Other Decision Support	—
2016 Voting	51.4

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	63.0
Healthy Places Index Score for Project Location (b)	73.0
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	Per project description of Building A and B
Construction: Construction Phases	Per model
Operations: Vehicle Data	per IS/MND

Wine Warehouse Detailed Report

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7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Wine Warehouse
Construction Start Date	1/1/2025
Operational Year	2025
Lead Agency	Napa County PBES
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.60
Precipitation (days)	38.4
Location	Morris Ct & Technology Way, California 94558, USA
County	Napa
City	Unincorporated
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	801
EDFZ	2
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

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
Refrigerated Warehouse-No Rail	143	1000sqft	13.2	143,312	—	—	—	Building A

Unrefrigerated Warehouse-No Rail	66.9	1000sqft	6.87	66,915	—	—	—	Building B
Parking Lot	129	Space	1.16	0.00	—	—	—	Parking Lot For Building A
Parking Lot	82.0	Space	0.74	0.00	—	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-13	Use Low-VOC Paints for Construction
Transportation	T-14*	Provide Electric Vehicle Charging Infrastructure
Energy	E-1	Buildings Exceed 2019 Title 24 Building Envelope Energy Efficiency Standards
Energy	E-2	Require Energy Efficient Appliances
Energy	E-10-A	Establish Onsite Renewable Energy Systems: Generic
Water	W-5	Design Water-Efficient Landscapes

* 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.	111	111	12.0	17.6	0.03	0.44	0.97	1.42	0.41	0.24	0.65	—	4,093	4,093	0.15	0.19	5.72	4,159
Mit.	50.1	50.1	12.0	17.6	0.03	0.44	0.97	1.42	0.41	0.24	0.65	—	4,093	4,093	0.15	0.19	5.72	4,159
% Reduced	55%	55%	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.89	3.28	29.8	29.1	0.06	1.23	9.37	10.6	1.14	3.69	4.83	—	6,761	6,761	0.27	0.19	0.15	6,785
Mit.	3.89	3.28	29.8	29.1	0.06	1.23	9.37	10.6	1.14	3.69	4.83	—	6,761	6,761	0.27	0.19	0.15	6,785
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.63	6.54	11.7	14.3	0.03	0.46	2.13	2.59	0.42	0.76	1.18	—	3,369	3,369	0.13	0.11	1.40	3,408
Mit.	3.29	3.20	11.7	14.3	0.03	0.46	2.13	2.59	0.42	0.76	1.18	—	3,369	3,369	0.13	0.11	1.40	3,408
% Reduced	50%	51%	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.21	1.19	2.14	2.62	< 0.005	0.08	0.39	0.47	0.08	0.14	0.22	—	558	558	0.02	0.02	0.23	564
Mit.	0.60	0.58	2.14	2.62	< 0.005	0.08	0.39	0.47	0.08	0.14	0.22	—	558	558	0.02	0.02	0.23	564
% Reduced	50%	51%	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	54.0	54.0	—	—	82.0	—	—	54.0	—	—	—	—	—	—	—	—	—
Unmit.	—	Yes	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—
Mit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	54.0	54.0	—	—	82.0	—	—	54.0	—	—	—	—	—	—	—	—	—
Unmit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—
Mit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—

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	1.81	1.52	12.0	17.6	0.03	0.44	0.97	1.42	0.41	0.24	0.65	—	4,093	4,093	0.15	0.19	5.72	4,159
2026	111	111	11.3	17.3	0.03	0.39	0.97	1.36	0.36	0.24	0.60	—	4,063	4,063	0.15	0.19	5.34	4,128
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	3.89	3.28	29.8	29.1	0.06	1.23	9.37	10.6	1.14	3.69	4.83	—	6,761	6,761	0.27	0.19	0.15	6,785
2026	1.72	1.44	11.5	16.9	0.03	0.39	0.97	1.36	0.36	0.24	0.60	—	4,013	4,013	0.15	0.19	0.14	4,073
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.65	1.38	11.7	14.3	0.03	0.46	2.13	2.59	0.42	0.76	1.18	—	3,369	3,369	0.13	0.11	1.40	3,408
2026	6.63	6.54	3.64	5.37	0.01	0.13	0.28	0.41	0.12	0.07	0.19	—	1,229	1,229	0.05	0.05	0.67	1,247
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.30	0.25	2.14	2.62	< 0.005	0.08	0.39	0.47	0.08	0.14	0.22	—	558	558	0.02	0.02	0.23	564
2026	1.21	1.19	0.66	0.98	< 0.005	0.02	0.05	0.07	0.02	0.01	0.03	—	203	203	0.01	0.01	0.11	206

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	1.81	1.52	12.0	17.6	0.03	0.44	0.97	1.42	0.41	0.24	0.65	—	4,093	4,093	0.15	0.19	5.72	4,159
2026	50.1	50.1	11.3	17.3	0.03	0.39	0.97	1.36	0.36	0.24	0.60	—	4,063	4,063	0.15	0.19	5.34	4,128

Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	3.89	3.28	29.8	29.1	0.06	1.23	9.37	10.6	1.14	3.69	4.83	—	6,761	6,761	0.27	0.19	0.15	6,785
2026	1.72	1.44	11.5	16.9	0.03	0.39	0.97	1.36	0.36	0.24	0.60	—	4,013	4,013	0.15	0.19	0.14	4,073
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.65	1.38	11.7	14.3	0.03	0.46	2.13	2.59	0.42	0.76	1.18	—	3,369	3,369	0.13	0.11	1.40	3,408
2026	3.29	3.20	3.64	5.37	0.01	0.13	0.28	0.41	0.12	0.07	0.19	—	1,229	1,229	0.05	0.05	0.67	1,247
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.30	0.25	2.14	2.62	< 0.005	0.08	0.39	0.47	0.08	0.14	0.22	—	558	558	0.02	0.02	0.23	564
2026	0.60	0.58	0.66	0.98	< 0.005	0.02	0.05	0.07	0.02	0.01	0.03	—	203	203	0.01	0.01	0.11	206

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.	7.84	7.62	1.35	17.4	0.02	0.05	1.59	1.64	0.04	0.40	0.45	200	4,618	4,817	20.7	0.37	3,827	9,271
Mit.	7.83	7.62	1.30	17.4	0.02	0.05	1.59	1.63	0.04	0.40	0.44	200	3,605	3,805	20.5	0.35	3,827	8,249
% Reduced	< 0.5%	< 0.5%	3%	< 0.5%	—	7%	—	< 0.5%	8%	—	1%	—	22%	21%	1%	5%	—	11%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.17	6.07	1.44	8.04	0.02	0.03	1.59	1.62	0.03	0.40	0.44	200	4,487	4,686	20.7	0.38	3,820	9,135
Mit.	6.17	6.07	1.39	8.00	0.02	0.03	1.59	1.62	0.03	0.40	0.43	200	3,474	3,674	20.5	0.36	3,820	8,113
% Reduced	< 0.5%	< 0.5%	3%	< 0.5%	—	10%	—	< 0.5%	11%	—	1%	—	23%	22%	1%	5%	—	11%

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.67	6.53	1.07	10.0	0.01	0.04	1.11	1.14	0.03	0.28	0.31	200	3,991	4,191	20.7	0.34	3,822	8,632
Mit.	6.66	6.53	1.02	9.99	0.01	0.03	1.11	1.14	0.03	0.28	0.31	200	2,979	3,178	20.5	0.33	3,822	7,610
% Reduced	< 0.5%	< 0.5%	4%	< 0.5%	—	9%	—	< 0.5%	10%	—	1%	—	25%	24%	1%	5%	—	12%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.22	1.19	0.19	1.83	< 0.005	0.01	0.20	0.21	0.01	0.05	0.06	33.1	661	694	3.42	0.06	633	1,429
Mit.	1.22	1.19	0.19	1.82	< 0.005	0.01	0.20	0.21	0.01	0.05	0.06	33.1	493	526	3.40	0.05	633	1,260
% Reduced	< 0.5%	< 0.5%	4%	< 0.5%	2%	9%	—	< 0.5%	10%	—	1%	—	25%	24%	1%	5%	—	12%
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	54.0	54.0	—	—	82.0	—	—	54.0	—	—	—	—	—	—	—	—	—
Unmit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—
Mit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	54.0	54.0	—	—	82.0	—	—	54.0	—	—	—	—	—	—	—	—	—
Unmit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—
Mit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	10.0	10.0	—	—	15.0	—	—	10.0	—	—	—	—	—	—	—	—	—
Unmit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—
Mit.	—	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—	—	—

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	1.08	0.99	1.08	8.11	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,922	1,922	0.08	0.09	7.82	1,959
Area	6.74	6.61	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Energy	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	2,482	2,482	0.39	0.04	—	2,505
Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	7.84	7.62	1.35	17.4	0.02	0.05	1.59	1.64	0.04	0.40	0.45	200	4,618	4,817	20.7	0.37	3,827	9,271
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.04	0.95	1.25	7.88	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,828	1,828	0.09	0.10	0.20	1,861
Area	5.11	5.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	2,482	2,482	0.39	0.04	—	2,505
Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	6.17	6.07	1.44	8.04	0.02	0.03	1.59	1.62	0.03	0.40	0.44	200	4,487	4,686	20.7	0.38	3,820	9,135
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.73	0.67	0.84	5.37	0.01	0.01	1.11	1.12	0.01	0.28	0.29	—	1,314	1,314	0.06	0.07	2.41	1,339
Area	5.91	5.85	0.04	4.51	< 0.005	0.01	—	0.01	0.01	—	0.01	—	18.5	18.5	< 0.005	< 0.005	—	18.6
Energy	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	2,482	2,482	0.39	0.04	—	2,505
Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373

Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	6.67	6.53	1.07	10.0	0.01	0.04	1.11	1.14	0.03	0.28	0.31	200	3,991	4,191	20.7	0.34	3,822	8,632
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.13	0.12	0.15	0.98	< 0.005	< 0.005	0.20	0.20	< 0.005	0.05	0.05	—	218	218	0.01	0.01	0.40	222
Area	1.08	1.07	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08
Energy	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	411	411	0.06	0.01	—	415
Water	—	—	—	—	—	—	—	—	—	—	—	15.4	29.1	44.6	1.59	0.04	—	95.6
Waste	—	—	—	—	—	—	—	—	—	—	—	17.6	0.00	17.6	1.76	0.00	—	61.7
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632
Total	1.22	1.19	0.19	1.83	< 0.005	0.01	0.20	0.21	0.01	0.05	0.06	33.1	661	694	3.42	0.06	633	1,429

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	1.08	0.99	1.08	8.11	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,922	1,922	0.08	0.09	7.82	1,959
Area	6.74	6.61	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Energy	0.02	0.01	0.14	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	1,470	1,470	0.23	0.03	—	1,483
Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	7.83	7.62	1.30	17.4	0.02	0.05	1.59	1.63	0.04	0.40	0.44	200	3,605	3,805	20.5	0.35	3,827	8,249
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.04	0.95	1.25	7.88	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,828	1,828	0.09	0.10	0.20	1,861
Area	5.11	5.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Energy	0.02	0.01	0.14	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	1,470	1,470	0.23	0.03	—	1,483
Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	6.17	6.07	1.39	8.00	0.02	0.03	1.59	1.62	0.03	0.40	0.43	200	3,474	3,674	20.5	0.36	3,820	8,113
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.73	0.67	0.84	5.37	0.01	0.01	1.11	1.12	0.01	0.28	0.29	—	1,314	1,314	0.06	0.07	2.41	1,339
Area	5.91	5.85	0.04	4.51	< 0.005	0.01	—	0.01	0.01	—	0.01	—	18.5	18.5	< 0.005	< 0.005	—	18.6
Energy	0.02	0.01	0.14	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	1,470	1,470	0.23	0.03	—	1,483
Water	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Waste	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	6.66	6.53	1.02	9.99	0.01	0.03	1.11	1.14	0.03	0.28	0.31	200	2,979	3,178	20.5	0.33	3,822	7,610
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.13	0.12	0.15	0.98	< 0.005	< 0.005	0.20	0.20	< 0.005	0.05	0.05	—	218	218	0.01	0.01	0.40	222
Area	1.08	1.07	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08
Energy	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	243	243	0.04	< 0.005	—	246
Water	—	—	—	—	—	—	—	—	—	—	—	15.4	29.1	44.6	1.59	0.04	—	95.6
Waste	—	—	—	—	—	—	—	—	—	—	—	17.6	0.00	17.6	1.76	0.00	—	61.7
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632
Total	1.22	1.19	0.19	1.82	< 0.005	0.01	0.20	0.21	0.01	0.05	0.06	33.1	493	526	3.40	0.05	633	1,260

3. Construction Emissions Details

3.1. 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
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Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.80	3.20	29.7	28.3	0.06	1.23	—	1.23	1.14	—	1.14	—	6,599	6,599	0.27	0.05	—	6,622
Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—
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	0.66	0.55	5.12	4.89	0.01	0.21	—	0.21	0.20	—	0.20	—	1,139	1,139	0.05	0.01	—	1,143
Dust From Material Movement	—	—	—	—	—	—	1.59	1.59	—	0.63	0.63	—	—	—	—	—	—	—
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	0.12	0.10	0.93	0.89	< 0.005	0.04	—	0.04	0.04	—	0.04	—	189	189	0.01	< 0.005	—	189
Dust From Material Movement	—	—	—	—	—	—	0.29	0.29	—	0.12	0.12	—	—	—	—	—	—	—

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	0.09	0.08	0.08	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	162	162	0.01	0.01	0.02	164
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.01	0.01	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.2	28.2	< 0.005	< 0.005	0.05	28.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.66	4.66	< 0.005	< 0.005	0.01	4.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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

3.2. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	3.80	3.20	29.7	28.3	0.06	1.23	—	1.23	1.14	—	1.14	—	6,599	6,599	0.27	0.05	—	6,622
Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—
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	0.66	0.55	5.12	4.89	0.01	0.21	—	0.21	0.20	—	0.20	—	1,139	1,139	0.05	0.01	—	1,143
Dust From Material Movement	—	—	—	—	—	—	1.59	1.59	—	0.63	0.63	—	—	—	—	—	—	—
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	0.12	0.10	0.93	0.89	< 0.005	0.04	—	0.04	0.04	—	0.04	—	189	189	0.01	< 0.005	—	189
Dust From Material Movement	—	—	—	—	—	—	0.29	0.29	—	0.12	0.12	—	—	—	—	—	—	—
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	0.09	0.08	0.08	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	162	162	0.01	0.01	0.02	164
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.01	0.01	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.2	28.2	< 0.005	< 0.005	0.05	28.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.66	4.66	< 0.005	< 0.005	0.01	4.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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

3.3. 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	0.00	0.00	0.00	0.00	0.00	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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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	0.00	0.00	0.00	0.00	0.00	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	0.73	0.61	5.68	7.09	0.01	0.23	—	0.23	0.22	—	0.22	—	1,304	1,304	0.05	0.01	—	1,309
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	0.13	0.11	1.04	1.29	< 0.005	0.04	—	0.04	0.04	—	0.04	—	216	216	0.01	< 0.005	—	217
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.39	0.36	0.25	4.08	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	766	766	0.02	0.03	3.25	779
Vendor	0.07	0.04	1.30	0.51	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	929	929	0.04	0.14	2.47	975
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	0.38	0.35	0.33	3.70	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	714	714	0.02	0.03	0.08	724
Vendor	0.07	0.03	1.38	0.53	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	930	930	0.04	0.14	0.06	973
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	0.20	0.19	0.16	1.93	0.00	0.00	0.39	0.39	0.00	0.09	0.09	—	392	392	0.01	0.02	0.76	398
Vendor	0.04	0.02	0.74	0.28	< 0.005	0.01	0.13	0.14	0.01	0.04	0.04	—	506	506	0.02	0.08	0.58	530
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	0.04	0.03	0.03	0.35	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	64.9	64.9	< 0.005	< 0.005	0.13	65.9
Vendor	0.01	< 0.005	0.13	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	83.7	83.7	< 0.005	0.01	0.10	87.7
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. 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	0.00	0.00	0.00	0.00	0.00	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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00	0.00	0.00	0.00	0.00	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	0.73	0.61	5.68	7.09	0.01	0.23	—	0.23	0.22	—	0.22	—	1,304	1,304	0.05	0.01	—	1,309
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	0.13	0.11	1.04	1.29	< 0.005	0.04	—	0.04	0.04	—	0.04	—	216	216	0.01	< 0.005	—	217
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.39	0.36	0.25	4.08	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	766	766	0.02	0.03	3.25	779
Vendor	0.07	0.04	1.30	0.51	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	929	929	0.04	0.14	2.47	975
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	0.38	0.35	0.33	3.70	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	714	714	0.02	0.03	0.08	724
Vendor	0.07	0.03	1.38	0.53	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	930	930	0.04	0.14	0.06	973
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	0.20	0.19	0.16	1.93	0.00	0.00	0.39	0.39	0.00	0.09	0.09	—	392	392	0.01	0.02	0.76	398
Vendor	0.04	0.02	0.74	0.28	< 0.005	0.01	0.13	0.14	0.01	0.04	0.04	—	506	506	0.02	0.08	0.58	530
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	0.04	0.03	0.03	0.35	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	64.9	64.9	< 0.005	< 0.005	0.13	65.9
Vendor	0.01	< 0.005	0.13	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	83.7	83.7	< 0.005	0.01	0.10	87.7

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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3.5. Building Construction (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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
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	0.36	0.30	2.76	3.63	0.01	0.11	—	0.11	0.10	—	0.10	—	671	671	0.03	0.01	—	673
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 Equipm	0.07	0.05	0.50	0.66	< 0.005	0.02	—	0.02	0.02	—	0.02	—	111	111	< 0.005	< 0.005	—	111
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.38	0.35	0.24	3.81	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	752	752	0.02	0.03	3.00	764
Vendor	0.07	0.03	1.24	0.49	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	914	914	0.04	0.14	2.35	959
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	0.37	0.33	0.30	3.45	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	701	701	0.02	0.03	0.08	711
Vendor	0.07	0.03	1.31	0.50	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	914	914	0.04	0.14	0.06	957
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	0.08	0.93	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	198	198	0.01	0.01	0.36	201
Vendor	0.02	0.01	0.36	0.14	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	256	256	0.01	0.04	0.28	268
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	0.04	0.04	0.00	0.01	0.01	—	32.8	32.8	< 0.005	< 0.005	0.06	33.3
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	42.4	42.4	< 0.005	0.01	0.05	44.4
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

3.6. Building Construction (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
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Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
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	0.36	0.30	2.76	3.63	0.01	0.11	—	0.11	0.10	—	0.10	—	671	671	0.03	0.01	—	673
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	0.07	0.05	0.50	0.66	< 0.005	0.02	—	0.02	0.02	—	0.02	—	111	111	< 0.005	< 0.005	—	111
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.38	0.35	0.24	3.81	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	752	752	0.02	0.03	3.00	764
Vendor	0.07	0.03	1.24	0.49	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	914	914	0.04	0.14	2.35	959
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	0.37	0.33	0.30	3.45	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	701	701	0.02	0.03	0.08	711
Vendor	0.07	0.03	1.31	0.50	0.01	0.01	0.24	0.26	0.01	0.07	0.08	—	914	914	0.04	0.14	0.06	957
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	0.08	0.93	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	198	198	0.01	0.01	0.36	201
Vendor	0.02	0.01	0.36	0.14	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	256	256	0.01	0.04	0.28	268
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	0.04	0.04	0.00	0.01	0.01	—	32.8	32.8	< 0.005	< 0.005	0.06	33.3
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	42.4	42.4	< 0.005	0.01	0.05	44.4
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

3.7. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	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	0.25	0.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipm ent	0.05	0.04	0.39	0.54	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
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 Equipm ent	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.04	0.65	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	128	128	< 0.005	< 0.005	0.51	130
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.01	0.01	0.00	< 0.005	< 0.005	—	6.59	6.59	< 0.005	< 0.005	0.01	6.69
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	—	1.09	1.09	< 0.005	< 0.005	< 0.005	1.11
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.25	0.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.05	0.04	0.39	0.54	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
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	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.04	0.65	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	128	128	< 0.005	< 0.005	0.51	130
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.01	0.01	0.00	< 0.005	< 0.005	—	6.59	6.59	< 0.005	< 0.005	0.01	6.69
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	—	1.09	1.09	< 0.005	< 0.005	< 0.005	1.11
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	111	111	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	6.07	6.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22
Architectural Coatings	1.11	1.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.05	0.76	0.00	0.00	0.15	0.15	0.00	0.03	0.03	—	150	150	< 0.005	0.01	0.60	153
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.75	7.75	< 0.005	< 0.005	0.01	7.87
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	—	1.28	1.28	< 0.005	< 0.005	< 0.005	1.30
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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

3.10. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	49.9	49.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	2.73	2.73	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22

Architectural Coating	0.50	0.50	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.05	0.76	0.00	0.00	0.15	0.15	0.00	0.03	0.03	—	150	150	< 0.005	0.01	0.60	153
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.75	7.75	< 0.005	< 0.005	0.01	7.87
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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	—	1.28	1.28	< 0.005	< 0.005	< 0.005	1.30
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.51	0.47	0.52	3.87	0.01	0.01	0.76	0.77	0.01	0.19	0.20	—	917	917	0.04	0.04	3.73	935
Unrefrigerated Warehouse-No Rail	0.56	0.52	0.57	4.24	0.01	0.01	0.83	0.84	0.01	0.21	0.22	—	1,005	1,005	0.04	0.05	4.09	1,024
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	1.08	0.99	1.08	8.11	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,922	1,922	0.08	0.09	7.82	1,959
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.50	0.45	0.60	3.76	0.01	0.01	0.76	0.77	0.01	0.19	0.20	—	872	872	0.04	0.05	0.10	888
Unrefrigerated Warehouse-No Rail	0.54	0.50	0.65	4.12	0.01	0.01	0.83	0.84	0.01	0.21	0.22	—	956	956	0.05	0.05	0.11	973
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	1.04	0.95	1.25	7.88	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,828	1,828	0.09	0.10	0.20	1,861
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated Warehouse-No	0.06	0.06	0.07	0.47	< 0.005	< 0.005	0.10	0.10	< 0.005	0.02	0.03	—	104	104	< 0.005	0.01	0.19	106
Unrefrigerated Warehouse-No Rail	0.07	0.06	0.08	0.51	< 0.005	< 0.005	0.11	0.11	< 0.005	0.03	0.03	—	114	114	0.01	0.01	0.21	116
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	0.13	0.12	0.15	0.98	< 0.005	< 0.005	0.20	0.20	< 0.005	0.05	0.05	—	218	218	0.01	0.01	0.40	222

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.51	0.47	0.52	3.87	0.01	0.01	0.76	0.77	0.01	0.19	0.20	—	917	917	0.04	0.04	3.73	935
Unrefrigerated Warehouse-No Rail	0.56	0.52	0.57	4.24	0.01	0.01	0.83	0.84	0.01	0.21	0.22	—	1,005	1,005	0.04	0.05	4.09	1,024
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	1.08	0.99	1.08	8.11	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,922	1,922	0.08	0.09	7.82	1,959
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated Warehouse-No Rail	0.50	0.45	0.60	3.76	0.01	0.01	0.76	0.77	0.01	0.19	0.20	—	872	872	0.04	0.05	0.10	888
Unrefrigerated Warehouse-No Rail	0.54	0.50	0.65	4.12	0.01	0.01	0.83	0.84	0.01	0.21	0.22	—	956	956	0.05	0.05	0.11	973
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	1.04	0.95	1.25	7.88	0.02	0.02	1.59	1.61	0.02	0.40	0.42	—	1,828	1,828	0.09	0.10	0.20	1,861
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.06	0.06	0.07	0.47	< 0.005	< 0.005	0.10	0.10	< 0.005	0.02	0.03	—	104	104	< 0.005	0.01	0.19	106
Unrefrigerated Warehouse-No Rail	0.07	0.06	0.08	0.51	< 0.005	< 0.005	0.11	0.11	< 0.005	0.03	0.03	—	114	114	0.01	0.01	0.21	116
Parking Lot	0.00	0.00	0.00	0.00	0.00	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	0.13	0.12	0.15	0.98	< 0.005	< 0.005	0.20	0.20	< 0.005	0.05	0.05	—	218	218	0.01	0.01	0.40	222

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,843	1,843	0.30	0.04	—	1,861
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	378	378	0.06	0.01	—	382
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	40.5	40.5	0.01	< 0.005	—	40.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,262	2,262	0.37	0.04	—	2,284
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,843	1,843	0.30	0.04	—	1,861
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	378	378	0.06	0.01	—	382
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	40.5	40.5	0.01	< 0.005	—	40.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,262	2,262	0.37	0.04	—	2,284
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	305	305	0.05	0.01	—	308
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	62.5	62.5	0.01	< 0.005	—	63.2

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	6.70	6.70	< 0.005	< 0.005	—	6.77
Total	—	—	—	—	—	—	—	—	—	—	—	—	374	374	0.06	0.01	—	378

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	907	907	0.15	0.02	—	916
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	353	353	0.06	0.01	—	356
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	40.5	40.5	0.01	< 0.005	—	40.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,301	1,301	0.21	0.03	—	1,313
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	907	907	0.15	0.02	—	916
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	353	353	0.06	0.01	—	356

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	40.5	40.5	0.01	< 0.005	—	40.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,301	1,301	0.21	0.03	—	1,313
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	150	150	0.02	< 0.005	—	152
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	58.4	58.4	0.01	< 0.005	—	59.0
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	6.70	6.70	< 0.005	< 0.005	—	6.77
Total	—	—	—	—	—	—	—	—	—	—	—	—	215	215	0.03	< 0.005	—	217

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	92.5	92.5	0.01	< 0.005	—	92.7
Unrefrigerated Warehouse-No Rail	0.01	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	128	128	0.01	< 0.005	—	129

Parking Lot	0.00	0.00	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	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	221	221	0.02	< 0.005	—	221
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	92.5	92.5	0.01	< 0.005	—	92.7
Unrefrigerated Warehouse-No Rail	0.01	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	128	128	0.01	< 0.005	—	129
Parking Lot	0.00	0.00	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	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	221	221	0.02	< 0.005	—	221
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.3	15.3	< 0.005	< 0.005	—	15.4
Unrefrigerated Warehouse-No Rail	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	21.3	21.3	< 0.005	< 0.005	—	21.3
Parking Lot	0.00	0.00	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	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	36.6	36.6	< 0.005	< 0.005	—	36.7

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	89.1	89.1	0.01	< 0.005	—	89.3
Unrefrigerated Warehouse-No Rail	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	80.3	80.3	0.01	< 0.005	—	80.5
Parking Lot	0.00	0.00	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	0.02	0.01	0.14	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	169	169	0.01	< 0.005	—	170
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	89.1	89.1	0.01	< 0.005	—	89.3
Unrefrigerated Warehouse-No Rail	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	80.3	80.3	0.01	< 0.005	—	80.5
Parking Lot	0.00	0.00	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	0.02	0.01	0.14	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	169	169	0.01	< 0.005	—	170
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated Warehouse-No	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14.8	14.8	< 0.005	< 0.005	—	14.8
Unrefrigerated Warehouse-No Rail	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.3	13.3	< 0.005	< 0.005	—	13.3
Parking Lot	0.00	0.00	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	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	28.0	28.0	< 0.005	< 0.005	—	28.1

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	4.51	4.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.61	0.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.63	1.50	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Total	6.74	6.61	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	4.51	4.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.61	0.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	5.11	5.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.82	0.82	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.15	0.14	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08
Total	1.08	1.07	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08

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	4.51	4.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.61	0.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.63	1.50	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Total	6.74	6.61	0.08	9.14	< 0.005	0.02	—	0.02	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	4.51	4.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.61	0.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	5.11	5.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.82	0.82	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.15	0.14	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08

Total	1.08	1.07	0.01	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.07	3.07	< 0.005	< 0.005	—	3.08
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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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	63.5	120	183	6.53	0.16	—	394
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	29.7	56.0	85.7	3.05	0.07	—	184
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	63.5	120	183	6.53	0.16	—	394
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	29.7	56.0	85.7	3.05	0.07	—	184

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	10.5	19.9	30.4	1.08	0.03	—	65.2
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	4.91	9.27	14.2	0.50	0.01	—	30.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	15.4	29.1	44.6	1.59	0.04	—	95.6

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	63.5	120	183	6.53	0.16	—	394
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	29.7	56.0	85.7	3.05	0.07	—	184

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	63.5	120	183	6.53	0.16	—	394
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	29.7	56.0	85.7	3.05	0.07	—	184
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	93.2	176	269	9.58	0.23	—	577
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	10.5	19.9	30.4	1.08	0.03	—	65.2
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	4.91	9.27	14.2	0.50	0.01	—	30.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	15.4	29.1	44.6	1.59	0.04	—	95.6

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	72.6	0.00	72.6	7.26	0.00	—	254
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	33.9	0.00	33.9	3.39	0.00	—	119
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	72.6	0.00	72.6	7.26	0.00	—	254
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	33.9	0.00	33.9	3.39	0.00	—	119
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	12.0	0.00	12.0	1.20	0.00	—	42.1
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	5.61	0.00	5.61	0.56	0.00	—	19.6
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	17.6	0.00	17.6	1.76	0.00	—	61.7

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	72.6	0.00	72.6	7.26	0.00	—	254
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	33.9	0.00	33.9	3.39	0.00	—	119
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	72.6	0.00	72.6	7.26	0.00	—	254
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	33.9	0.00	33.9	3.39	0.00	—	119
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	107	0.00	107	10.6	0.00	—	373
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	12.0	0.00	12.0	1.20	0.00	—	42.1
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	5.61	0.00	5.61	0.56	0.00	—	19.6
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	17.6	0.00	17.6	1.76	0.00	—	61.7

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,819	3,819
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	632	632

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)

Equipm ent 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)

Equipm ent 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. 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)

Equipm ent 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)

Equipm ent 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)

Equipm ent 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)

Equipm ent 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)

Vegetati on	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)

Vegetati	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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
Grading	Grading	1/1/2025	3/28/2025	5.00	63.0	—
Building Construction	Building Construction	3/29/2025	5/23/2026	5.00	300	—
Paving	Paving	5/24/2026	6/21/2026	5.00	20.0	—
Architectural Coating	Architectural Coating	6/22/2026	7/20/2026	5.00	20.0	—

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
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/Back hoes	Diesel	Average	2.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
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/Back hoes	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

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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/Back hoes	Diesel	Average	2.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
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/Back hoes	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
Grading	—	—	—	—

Grading	Worker	20.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	88.3	11.7	LDA,LDT1,LDT2
Building Construction	Vendor	34.5	8.40	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	17.7	11.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.40	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Grading	—	—	—	—
Grading	Worker	20.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—

Building Construction	Worker	88.3	11.7	LDA,LDT1,LDT2
Building Construction	Vendor	34.5	8.40	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	17.7	11.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.40	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

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	315,341	105,114	4,963

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
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Grading	—	—	189	0.00	—
Paving	0.00	0.00	0.00	0.00	1.90

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Refrigerated Warehouse-No Rail	0.00	0%
Unrefrigerated Warehouse-No Rail	0.00	0%
Parking Lot	1.16	100%
Parking Lot	0.74	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	204	0.03	< 0.005
2026	0.00	204	0.03	< 0.005

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
Refrigerated Warehouse-No Rail	104	0.00	0.00	27,115	1,064	0.00	0.00	277,441
Unrefrigerated Warehouse-No Rail	114	0.00	0.00	29,720	1,166	0.00	0.00	304,104
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMt/Weekday	VMt/Saturday	VMt/Sunday	VMt/Year
Refrigerated Warehouse-No Rail	104	0.00	0.00	27,115	1,064	0.00	0.00	277,441
Unrefrigerated Warehouse-No Rail	114	0.00	0.00	29,720	1,166	0.00	0.00	304,104
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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	315,341	105,114	4,963

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
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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)
Refrigerated Warehouse-No Rail	3,298,193	204	0.0330	0.0040	288,569
Unrefrigerated Warehouse-No Rail	676,021	204	0.0330	0.0040	400,564
Parking Lot	44,302	204	0.0330	0.0040	0.00
Parking Lot	28,161	204	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)
Refrigerated Warehouse-No Rail	1,623,703	204	0.0330	0.0040	278,014
Unrefrigerated Warehouse-No Rail	630,961	204	0.0330	0.0040	250,539
Parking Lot	44,302	204	0.0330	0.0040	0.00
Parking Lot	28,161	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
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Refrigerated Warehouse-No Rail	33,140,900	0.00
Unrefrigerated Warehouse-No Rail	15,474,094	0.00
Parking Lot	0.00	0.00
Parking Lot	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Refrigerated Warehouse-No Rail	33,140,900	0.00
Unrefrigerated Warehouse-No Rail	15,474,094	0.00
Parking Lot	0.00	0.00
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Refrigerated Warehouse-No Rail	135	—
Unrefrigerated Warehouse-No Rail	62.9	—
Parking Lot	0.00	—
Parking Lot	0.00	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Refrigerated Warehouse-No Rail	135	—
Unrefrigerated Warehouse-No Rail	62.9	—
Parking Lot	0.00	—
Parking Lot	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
Refrigerated Warehouse-No Rail	Cold storage	R-404A	3,922	7.50	7.50	7.50	25.0

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Refrigerated Warehouse-No Rail	Cold storage	R-404A	3,922	7.50	7.50	7.50	25.0

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
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5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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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
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5.16.2. Process Boilers

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

Equipment Type	Fuel Type
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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
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5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

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

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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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	11.8	annual days of extreme heat
Extreme Precipitation	5.65	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	16.4	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	N/A	N/A	N/A	N/A
Extreme Precipitation	2	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	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	N/A	N/A	N/A	N/A
Extreme Precipitation	2	1	1	3
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
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	16.8
AQ-PM	35.7
AQ-DPM	23.4
Drinking Water	69.2
Lead Risk Housing	55.8
Pesticides	66.2
Toxic Releases	61.2
Traffic	83.3
Effect Indicators	—
CleanUp Sites	62.4
Groundwater	0.00
Haz Waste Facilities/Generators	82.7
Impaired Water Bodies	23.9
Solid Waste	83.9
Sensitive Population	—
Asthma	71.9
Cardio-vascular	67.0
Low Birth Weights	51.0
Socioeconomic Factor Indicators	—
Education	62.0
Housing	12.0
Linguistic	39.2
Poverty	33.8
Unemployment	36.4

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	80.85461311
Employed	75.23418452
Median HI	74.554087
Education	—
Bachelor's or higher	69.35711536
High school enrollment	100
Preschool enrollment	12.62671628
Transportation	—
Auto Access	83.51084306
Active commuting	27.38354934
Social	—
2-parent households	62.7229565
Voting	57.75696138
Neighborhood	—
Alcohol availability	76.10676248
Park access	56.71756705
Retail density	24.22687027
Supermarket access	27.9481586
Tree canopy	22.44321827
Housing	—
Homeownership	87.02681894
Housing habitability	96.41986398
Low-inc homeowner severe housing cost burden	70.11420506
Low-inc renter severe housing cost burden	97.06146542
Uncrowded housing	60.05389452
Health Outcomes	—

Insured adults	79.19928141
Arthritis	0.0
Asthma ER Admissions	56.0
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	25.5
Cognitively Disabled	20.1
Physically Disabled	17.3
Heart Attack ER Admissions	55.3
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	43.5
Children	32.5
Elderly	69.3

English Speaking	60.5
Foreign-born	72.3
Outdoor Workers	52.3
Climate Change Adaptive Capacity	—
Impervious Surface Cover	43.7
Traffic Density	45.1
Traffic Access	23.0
Other Indices	—
Hardship	34.8
Other Decision Support	—
2016 Voting	51.4

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	63.0
Healthy Places Index Score for Project Location (b)	73.0
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

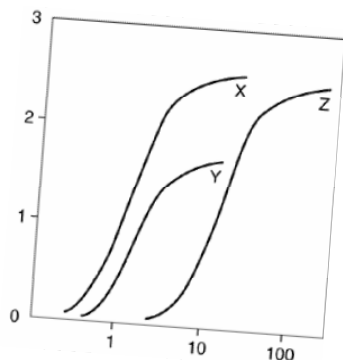
Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Per project description of Building A and B
Construction: Construction Phases	Per model
Operations: Vehicle Data	per IS/MND



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James J. J. Clark, Ph.D.

Principal Toxicologist

Toxicology/Exposure Assessment Modeling

Risk Assessment/Analysis/Dispersion Modeling

Education:

Ph.D., Environmental Health Science, University of California, 1995

M.S., Environmental Health Science, University of California, 1993

B.S., Biophysical and Biochemical Sciences, University of Houston, 1987

Professional Experience:

Dr. Clark is a well recognized toxicologist, air modeler, and health scientist. He has 20 years of experience in researching the effects of environmental contaminants on human health including environmental fate and transport modeling (SCREEN3, AEROMOD, ISCST3, Johnson-Ettinger Vapor Intrusion Modeling); exposure assessment modeling (partitioning of contaminants in the environment as well as PBPK modeling); conducting and managing human health risk assessments for regulatory compliance and risk-based clean-up levels; and toxicological and medical literature research.

Significant projects performed by Dr. Clark include the following:

LITIGATION SUPPORT

Case: James Harold Caygle, et al, v. Drummond Company, Inc. Circuit Court for the Tenth Judicial Circuit, Jefferson County, Alabama. Civil Action. CV-2009

Client: Environmental Litigation Group, Birmingham, Alabama

Dr. Clark performed an air quality assessment of emissions from a coke factory located in Tarrant, Alabama. The assessment reviewed include a comprehensive review of air quality standards, measured concentrations of pollutants from factory, an inspection of the facility and detailed assessment of the impacts on the community. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Rose Roper V. Nissan North America, et al. Superior Court of the State Of California for the County Of Los Angeles – Central Civil West. Civil Action. NC041739

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to multiple chemicals, including benzene, who later developed a respiratory distress. A review of the individual's medical and occupational history was performed to prepare an exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to respiratory irritants. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: O'Neil V. Sherwin Williams, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to petroleum distillates who later developed a bladder cancer. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Summary judgment for defendants.

Case: Moore V., Shell Oil Company, et al. Superior Court of the State Of California for the County Of Los Angeles

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to chemicals while benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Raymond Saltonstall V. Fuller O'Brien, KILZ, and Zinsser, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Richard Boyer and Elizabeth Boyer, husband and wife, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-7G.

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: JoAnne R. Cook, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-9R

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of an individual exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Patrick Allen And Susan Allen, husband and wife, and Andrew Allen, a minor, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-W

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Michael Fahey, Susan Fahey V. Atlantic Richfield Company, et al. United States District Court Central District of California Civil Action Number CV-06 7109 JCL.

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Constance Acevedo, et al., V. California Spray-Chemical Company, et al., Superior Court of the State Of California, County Of Santa Cruz. Case No. CV 146344

Dr. Clark performed a comprehensive exposure assessment of community members exposed to toxic metals from a former lead arsenate manufacturing facility. The former manufacturing site had undergone a DTSC mandated removal action/remediation for the presence of the toxic metals at the site. Opinions were presented regarding the elevated levels of arsenic and lead (in attic dust and soils) found throughout the community and the potential for harm to the plaintiffs in question.

Case Result: Settlement in favor of defendant.

Case: Michael Nawrocki V. The Coastal Corporation, Kurk Fuel Company, Pautler Oil Service, State of New York Supreme Court, County of Erie, Index Number I2001-11247

Client: Richard G. Berger Attorney At Law, Buffalo, New York

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the

known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Judgement in favor of defendant.

SELECTED AIR MODELING RESEARCH/PROJECTS

Client – Confidential

Dr. Clark performed a comprehensive evaluation of criteria pollutants, air toxins, and particulate matter emissions from a carbon black production facility to determine the impacts on the surrounding communities. The results of the dispersion model will be used to estimate acute and chronic exposure concentrations to multiple contaminants and will be incorporated into a comprehensive risk evaluation.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of air toxins and particulate matter emissions from a railroad tie manufacturing facility to determine the impacts on the surrounding communities. The results of the dispersion model have been used to estimate acute and chronic exposure concentrations to multiple contaminants and have been incorporated into a comprehensive risk evaluation.

Client – Los Angeles Alliance for a New Economy (LAANE), Los Angeles, California

Dr. Clark is advising the LAANE on air quality issues related to current flight operations at the Los Angeles International Airport (LAX) operated by the Los Angeles World Airport (LAWA) Authority. He is working with the LAANE and LAX staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client – City of Santa Monica, Santa Monica, California

Dr. Clark is advising the City of Santa Monica on air quality issues related to current flight operations at the facility. He is working with the City staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client: Omnitrans, San Bernardino, California

Dr. Clark managed a public health survey of three communities near transit fueling facilities in San Bernardino and Montclair California in compliance with California Senate Bill 1927. The survey included an epidemiological survey of the effected communities, emission surveys of local businesses, dispersion modeling to determine potential emission concentrations within the communities, and a comprehensive risk assessment of each community. The results of the study were presented to the Governor as mandated by Senate Bill 1927.

Client: Confidential, San Francisco, California

Summarized cancer types associated with exposure to metals and smoking. Researched the specific types of cancers associated with exposure to metals and smoking. Provided causation analysis of the association between cancer types and exposure for use by non-public health professionals.

Client: Confidential, Minneapolis, Minnesota

Prepared human health risk assessment of workers exposed to VOCs from neighboring petroleum storage/transport facility. Reviewed the systems in place for distribution of petroleum hydrocarbons to identify chemicals of concern (COCs), prepared comprehensive toxicological summaries of COCs, and quantified potential risks from carcinogens and non-carcinogens to receptors at or adjacent to site. This evaluation was used in the support of litigation.

Client – United Kingdom Environmental Agency

Dr. Clark is part of team that performed comprehensive evaluation of soil vapor intrusion of VOCs from former landfill adjacent residences for the United Kingdom's Environment

Agency. The evaluation included collection of liquid and soil vapor samples at site, modeling of vapor migration using the Johnson Ettinger Vapor Intrusion model, and calculation of site-specific health based vapor thresholds for chlorinated solvents, aromatic hydrocarbons, and semi-volatile organic compounds. The evaluation also included a detailed evaluation of the use, chemical characteristics, fate and transport, and toxicology of chemicals of concern (COC). The results of the evaluation have been used as a briefing tool for public health professionals.

EMERGING/PERSISTENT CONTAMINANT RESEARCH/PROJECTS

Client: Ameren Services, St. Louis, Missouri

Managed the preparation of a comprehensive human health risk assessment of workers and residents at or near an NPL site in Missouri. The former operations at the Property included the servicing and repair of electrical transformers, which resulted in soils and groundwater beneath the Property and adjacent land becoming impacted with PCB and chlorinated solvent compounds. The results were submitted to U.S. EPA for evaluation and will be used in the final ROD.

Client: City of Santa Clarita, Santa Clarita, California

Dr. Clark is managing the oversight of the characterization, remediation and development activities of a former 1,000 acre munitions manufacturing facility for the City of Santa Clarita. The site is impacted with a number of contaminants including perchlorate, unexploded ordinance, and volatile organic compounds (VOCs). The site is currently under a number of regulatory consent orders, including an Imminent and Substantial Endangerment Order. Dr. Clark is assisting the impacted municipality with the development of remediation strategies, interaction with the responsible parties and stakeholders, as well as interfacing with the regulatory agency responsible for oversight of the site cleanup.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of perchlorate in environment. Dr. Clark evaluated the production, use, chemical characteristics, fate and transport, toxicology, and remediation of perchlorate. Perchlorates form the basis of solid rocket fuels and have recently been detected in water supplies in the United States. The results of this research

were presented to the USEPA, National GroundWater, and ultimately published in a recent book entitled *Perchlorate in the Environment*.

Client – Confidential, Los Angeles, California

Dr. Clark is performing a comprehensive review of the potential for pharmaceuticals and their by-products to impact groundwater and surface water supplies. This evaluation will include a review if available data on the history of pharmaceutical production in the United States; the chemical characteristics of various pharmaceuticals; environmental fate and transport; uptake by xenobiotics; the potential effects of pharmaceuticals on water treatment systems; and the potential threat to public health. The results of the evaluation may be used as a briefing tool for non-public health professionals.

PUBLIC HEALTH/TOXICOLOGY

Client: Brayton Purcell, Novato, California

Dr. Clark performed a toxicological assessment of residents exposed to methyl-tertiary butyl ether (MTBE) from leaking underground storage tanks (LUSTs) adjacent to the subject property. The symptomology of residents and guests of the subject property were evaluated against the known outcomes in published literature to exposure to MTBE. The study found that residents had been exposed to MTBE in their drinking water; that concentrations of MTBE detected at the site were above regulatory guidelines; and, that the symptoms and outcomes expressed by residents and guests were consistent with symptoms and outcomes documented in published literature.

Client: Confidential, San Francisco, California

Identified and analyzed fifty years of epidemiological literature on workplace exposures to heavy metals. This research resulted in a summary of the types of cancer and non-cancer diseases associated with occupational exposure to chromium as well as the mortality and morbidity rates.

Client: Confidential, San Francisco, California

Summarized major public health research in United States. Identified major public health research efforts within United States over last twenty years. Results were used as a briefing tool for non-public health professionals.

Client: Confidential, San Francisco, California

Quantified the potential multi-pathway dose received by humans from a pesticide applied indoors. Part of team that developed exposure model and evaluated exposure concentrations in a comprehensive report on the plausible range of doses received by a specific person. This evaluation was used in the support of litigation.

Client: Covanta Energy, Westwood, California

Evaluated health risk from metals in biosolids applied as soil amendment on agricultural lands. The biosolids were created at a forest waste cogeneration facility using 96% whole tree wood chips and 4 percent green waste. Mass loading calculations were used to estimate Cr(VI) concentrations in agricultural soils based on a maximum loading rate of 40 tons of biomass per acre of agricultural soil. The results of the study were used by the Regulatory agency to determine that the application of biosolids did not constitute a health risk to workers applying the biosolids or to residences near the agricultural lands.

Client – United Kingdom Environmental Agency

Oversaw a comprehensive toxicological evaluation of methyl-*tertiary* butyl ether (MtBE) for the United Kingdom's Environment Agency. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of MtBE. The results of the evaluation have been used as a briefing tool for public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of *tertiary* butyl alcohol (TBA) in municipal drinking water system. TBA is the primary breakdown product of MtBE, and is suspected to be the primary cause of MtBE toxicity. This evaluation will include available information on the production, use, chemical characteristics, fate and transport in the environment, absorption, distribution, routes of detoxification, metabolites, carcinogenic potential, and remediation of TBA. The results of the evaluation were used as a briefing tool for non-public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of methyl *tertiary* butyl ether (MTBE) in municipal drinking water system. MTBE is a chemical added to gasoline to increase the octane

rating and to meet Federally mandated emission criteria. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of MTBE. The results of the evaluation have been used as a briefing tool for non-public health professionals.

Client – Ministry of Environment, Lands & Parks, British Columbia

Dr. Clark assisted in the development of water quality guidelines for methyl tertiary-butyl ether (MTBE) to protect water uses in British Columbia (BC). The water uses to be considered includes freshwater and marine life, wildlife, industrial, and agricultural (e.g., irrigation and livestock watering) water uses. Guidelines from other jurisdictions for the protection of drinking water, recreation and aesthetics were to be identified.

Client: Confidential, Los Angeles, California

Prepared physiologically based pharmacokinetic (PBPK) assessment of lead risk of receptors at middle school built over former industrial facility. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client: Kaiser Venture Incorporated, Fontana, California

Prepared PBPK assessment of lead risk of receptors at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

RISK ASSESSMENTS/REMEDIAL INVESTIGATIONS

Client: Confidential, Atlanta, Georgia

Researched potential exposure and health risks to community members potentially exposed to creosote, polycyclic aromatic hydrocarbons, pentachlorophenol, and dioxin compounds used at a former wood treatment facility. Prepared a comprehensive toxicological summary of the chemicals of concern, including the chemical characteristics, absorption, distribution, and carcinogenic potential. Prepared risk characterization of the carcinogenic and non-carcinogenic chemicals based on the exposure assessment to quantify the potential risk to members of the surrounding community. This evaluation was used to help settle class-action tort.

Client: Confidential, Escondido, California

Prepared comprehensive Preliminary Endangerment Assessment (PEA) of dense non-aqueous liquid phase hydrocarbon (chlorinated solvents) contamination at a former printed circuit board manufacturing facility. This evaluation was used for litigation support and may be used as the basis for reaching closure of the site with the lead regulatory agency.

Client: Confidential, San Francisco, California

Summarized epidemiological evidence for connective tissue and autoimmune diseases for product liability litigation. Identified epidemiological research efforts on the health effects of medical prostheses. This research was used in a meta-analysis of the health effects and as a briefing tool for non-public health professionals.

Client: Confidential, Bogotá, Columbia

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of a 13.7 hectares plastic manufacturing facility in Bogotá, Colombia. The risk assessment was used as the basis for the remedial goals and closure of the site.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally cadmium) and VOCs from soil and soil vapor at 12-acre former crude oilfield and municipal landfill. The site is currently used as a middle school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and was used as the basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Managed remedial investigation (RI) of heavy metals and volatile organic chemicals (VOCs) for a 15-acre former manufacturing facility. The RI investigation of the site included over 800 different sampling locations and the collection of soil, soil gas, and groundwater samples. The site is currently used as a year round school housing approximately 3,000 children. The Remedial Investigation was performed in a manner

that did not interrupt school activities and met the time restrictions placed on the project by the overseeing regulatory agency. The RI Report identified the off-site source of metals that impacted groundwater beneath the site and the sources of VOCs in soil gas and groundwater. The RI included a numerical model of vapor intrusion into the buildings at the site from the vadose zone to determine exposure concentrations and an air dispersion model of VOCs from the proposed soil vapor treatment system. The Feasibility Study for the Site is currently being drafted and may be used as the basis for granting closure of the site by DTSC.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally lead), VOCs, SVOCs, and PCBs from soil, soil vapor, and groundwater at 15-acre former manufacturing facility. The site is currently used as a year round school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and will be basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of VOC vapor intrusion into classrooms of middle school that was former 15-acre industrial facility. Using the Johnson-Ettinger Vapor Intrusion model, the evaluation determined acceptable soil gas concentrations at the site that did not pose health threat to students, staff, and residents. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client –Dominguez Energy, Carson, California

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of 6-acre portion of a 500-acre oil and natural gas production facility in Carson, California. The risk assessment was used as the basis for closure of the site.

Kaiser Ventures Incorporated, Fontana, California

Prepared health risk assessment of semi-volatile organic chemicals and metals for a fifty-year old wastewater treatment facility used at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

ANR Freight - Los Angeles, California

Prepared a comprehensive Preliminary Endangerment Assessment (PEA) of petroleum hydrocarbon and metal contamination of a former freight depot. This evaluation was as the basis for reaching closure of the site with lead regulatory agency.

Kaiser Ventures Incorporated, Fontana, California

Prepared comprehensive health risk assessment of semi-volatile organic chemicals and metals for 23-acre parcel of a 1,100-acre former steel mill. The health risk assessment was used to determine clean up goals and as the basis for granting closure of the site by lead regulatory agency. Air dispersion modeling using ISCST3 was performed to determine downwind exposure point concentrations at sensitive receptors within a 1 kilometer radius of the site. The results of the health risk assessment were presented at a public meeting sponsored by the Department of Toxic Substances Control (DTSC) in the community potentially affected by the site.

Unocal Corporation - Los Angeles, California

Prepared comprehensive assessment of petroleum hydrocarbons and metals for a former petroleum service station located next to sensitive population center (elementary school). The assessment used a probabilistic approach to estimate risks to the community and was used as the basis for granting closure of the site by lead regulatory agency.

Client: Confidential, Los Angeles, California

Managed oversight of remedial investigation most contaminated heavy metal site in California. Lead concentrations in soil excess of 68,000,000 parts per billion (ppb) have been measured at the site. This State Superfund Site was a former hard chrome plating operation that operated for approximately 40-years.

Client: Confidential, San Francisco, California

Coordinator of regional monitoring program to determine background concentrations of metals in air. Acted as liaison with SCAQMD and CARB to perform co-location sampling and comparison of accepted regulatory method with ASTM methodology.

Client: Confidential, San Francisco, California

Analyzed historical air monitoring data for South Coast Air Basin in Southern California and potential health risks related to ambient concentrations of carcinogenic metals and volatile organic compounds. Identified and reviewed the available literature and calculated risks from toxins in South Coast Air Basin.

IT Corporation, North Carolina

Prepared comprehensive evaluation of potential exposure of workers to air-borne VOCs at hazardous waste storage facility under SUPERFUND cleanup decree. Assessment used in developing health based clean-up levels.

Professional Associations

American Public Health Association (APHA)

Association for Environmental Health and Sciences (AEHS)

American Chemical Society (ACS)

California Redevelopment Association (CRA)

International Society of Environmental Forensics (ISEF)

Society of Environmental Toxicology and Chemistry (SETAC)

Publications and Presentations:

Books and Book Chapters

Sullivan, P., **J.J. J. Clark**, F.J. Agardy, and P.E. Rosenfeld. (2007). *Synthetic Toxins In The Food, Water and Air of American Cities*. Elsevier, Inc. Burlington, MA.

Sullivan, P. and **J.J. J. Clark**. 2006. *Choosing Safer Foods, A Guide To Minimizing Synthetic Chemicals In Your Diet*. Elsevier, Inc. Burlington, MA.

Sullivan, P., Agardy, F.J., and **J.J.J. Clark**. 2005. *The Environmental Science of Drinking Water*. Elsevier, Inc. Burlington, MA.

Sullivan, P.J., Agardy, F.J., **Clark, J.J.J.** 2002. *America's Threatened Drinking Water: Hazards and Solutions*. Trafford Publishing, Victoria B.C.

Clark, J.J.J. 2001. "TBA: Chemical Properties, Production & Use, Fate and Transport, Toxicology, Detection in Groundwater, and Regulatory Standards" in *Oxygenates in the Environment*. Art Diaz, Ed.. Oxford University Press: New York.

Clark, J.J.J. 2000. "Toxicology of Perchlorate" in *Perchlorate in the Environment*. Edward Urbansky, Ed. Kluwer/Plenum: New York.

Clark, J.J.J. 1995. Probabilistic Forecasting of Volatile Organic Compound Concentrations At The Soil Surface From Contaminated Groundwater. UMI.

Baker, J.; **Clark, J.J.J.**; Stanford, J.T. 1994. Ex Situ Remediation of Diesel Contaminated Railroad Sand by Soil Washing. Principles and Practices for Diesel Contaminated Soils, Volume III. P.T. Kostecki, E.J. Calabrese, and C.P.L. Barkan, eds. Amherst Scientific Publishers, Amherst, MA. pp 89-96.

Journal and Proceeding Articles

- Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. Organohalogen Compounds, Volume 70 (2008) page 002254.
- Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. Organohalogen Compounds, Volume 70 (2008) page 000527
- Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** (2007). "Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." *Environmental Research*. 105:194-199.
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- Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** 2006. "Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006, August 21 – 25, 2006. Radisson SAS Scandinavia Hotel in Oslo Norway.
- Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2005. "The Value Of An Odor Quality Classification Scheme For Compost Facility Evaluations" The U.S. Composting Council's 13th Annual Conference January 23 - 26, 2005, Crowne Plaza Riverwalk, San Antonio, TX.
- Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2004. "The Value Of An Odor Quality Classification Scheme For Urban Odor" WEFTEC 2004. 77th Annual Technical Exhibition & Conference October 2 - 6, 2004, Ernest N. Morial Convention Center, New Orleans, Louisiana.
- Clark, J.J.J.** 2003. "Manufacturing, Use, Regulation, and Occurrence of a Known Endocrine Disrupting Chemical (EDC), 2,4-Dichlorophenoxyacetic Acid (2,4-D) in California Drinking Water Supplies." National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Minneapolis, MN. March 20, 2003.

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EXHIBIT B

Shawn Smallwood, PhD
3108 Finch Street
Davis, CA 95616

Tara Rengifo
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

15 November 2024

RE: E&P Technology Way - Building A & B

Dear Ms. Rengifo,

I write to comment on potentially significant impacts to biological resources from the proposed E&P Technology Way - Building A & B, which I understand would add one 143,312 sf warehouse and a 13,000 sf outbuilding, and another 66,915 sf warehouse for a total 223,227 sf, along with 211 total parking spaces and spaces for eight semi-trailers located on Technology Way in the Napa Valley Business Park Specific Plan area, County of Napa, California. I comment on the characterization of the existing environmental setting and on the analyses of impacts to biological resources in FirstCarbon Solutions (2024) and the County's Initial Study/Mitigated Negative Declaration (IS/MND).

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My qualifications for preparing expert comments are the following. I hold a Ph.D. degree in Ecology from University of California at Davis, where I also worked as a post-graduate researcher in the Department of Agronomy and Range Sciences. My research has been on animal density and distribution, habitat selection, wildlife interactions with the anthrosphere, and conservation of rare and endangered species. I authored many papers on these and other topics. I served as Chair of the Conservation Affairs Committee for The Wildlife Society – Western Section. I am a member of The Wildlife Society and Raptor Research Foundation, and I've lectured part-time at California State University, Sacramento. I was Associate Editor of wildlife biology's premier scientific journal, The Journal of Wildlife Management, as well as of Biological Conservation, and I was on the Editorial Board of Environmental Management. I have performed wildlife surveys in California for thirty-seven years. My CV is attached.

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EXISTING ENVIRONMENTAL SETTING

The first step in analysis of potential project impacts to biological resources is to accurately characterize the existing environmental setting, including the wildlife community, key ecological relationships, and known and ongoing threats to special-status species. A reasonably accurate characterization of the environmental setting can provide the baseline against which to analyze potential project impacts. For this reason, characterization of the environmental setting, including its regional setting, is one of the CEQA's essential analytical steps. Methods to achieve this first step typically include (1) surveys of the site for biological resources, and (2) reviews of literature, databases and local experts for documented occurrences of special-status species. In the case of the proposed project, this first step remains incomplete and misleading.

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Environmental Setting informed by Field Surveys

To the CEQA's primary objective to disclose potential environmental impacts of a proposed project, the analysis should be informed of which biological species are known to occur at the proposed project site, which special-status species are likely to occur, as well as the limitations of the survey effort directed to the site. Analysts need this information to characterize the environmental setting as a basis for opining on, or predicting, potential project impacts to biological resources.

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The IS/MND (p. 10) reports that "The Biological Resources Analysis was prepared by FCS in January 2024 (updated February 2024) to determine if any biological resources were *potentially present*..." (emphasis added) But this reporting is misleading. FirstCarbon Solutions (2024) had a biologist survey the project site on 8 December 2022 to record "the location and identity of all plant and animal species *encountered*." (emphasis added) FirstCarbon Solutions' statement of objectives differs from the objective claimed in the IS/MND. A reconnaissance survey cannot achieve the objective claimed in the IS/MND.

40

The reconnaissance survey began at 11:00 hours, but FirstCarbon Solutions (2024) did not report how long the survey lasted. Without knowing how long the survey lasted, the survey result cannot be fully interpreted. Survey duration imparts a large influence over which species are detected and how many species are detected.

41

The 11:00 start time would have had the effect of limiting the number of species detected. I have found that a late morning start time detects 34% fewer species than an early morning start time (Figure 1).

42

FirstCarbon Solutions (2024) detected 13 taxa of vertebrate wildlife, four (31%) of which the biologist was unable to identify to species. For comparison, I have detected 69 species of vertebrate wildlife in only 8.56 hours of visual-scan surveys at three locations within 700 m of the project site (Tables 1 and 2). Thirteen of these species were special-status species. At a cluster of three other project sites that I surveyed 4,345 m (2.7 miles) south-southeast of the project site, I or one or more of three consulting firms detected 44 species of vertebrate wildlife, including nine special-status species (Table 3). Inclusive of the findings from these surveys, I am aware of 113 species of vertebrate wildlife, including 22 special-status species within only 2.7 miles of the project site. Again, FirstCarbon Solutions (2024) detected only 13 taxa of vertebrate wildlife, or only 11% of the number of species known to the local project area by professional biologists. FirstCarbon Solutions' (2024) reconnaissance survey effort was grossly deficient, and its results ill-suited for characterizing the existing environmental setting.

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FirstCarbon Solutions (2024) failed to implement the CDFW (2018) survey guidelines for rare plants. FirstCarbon Solutions (2024) should have disclosed that the guidelines were available and should have been implemented.

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Figure 1. Numbers of vertebrate wildlife species detected in visual-scan surveys as proportions of the maximum number detected among 5 surveys per project site, and as a function of start time during the day. The red symbols represent the Greentree project site in Vacaville, and the blue symbols represent the Kassis site in Rancho Cordova, spring and summer 2022.

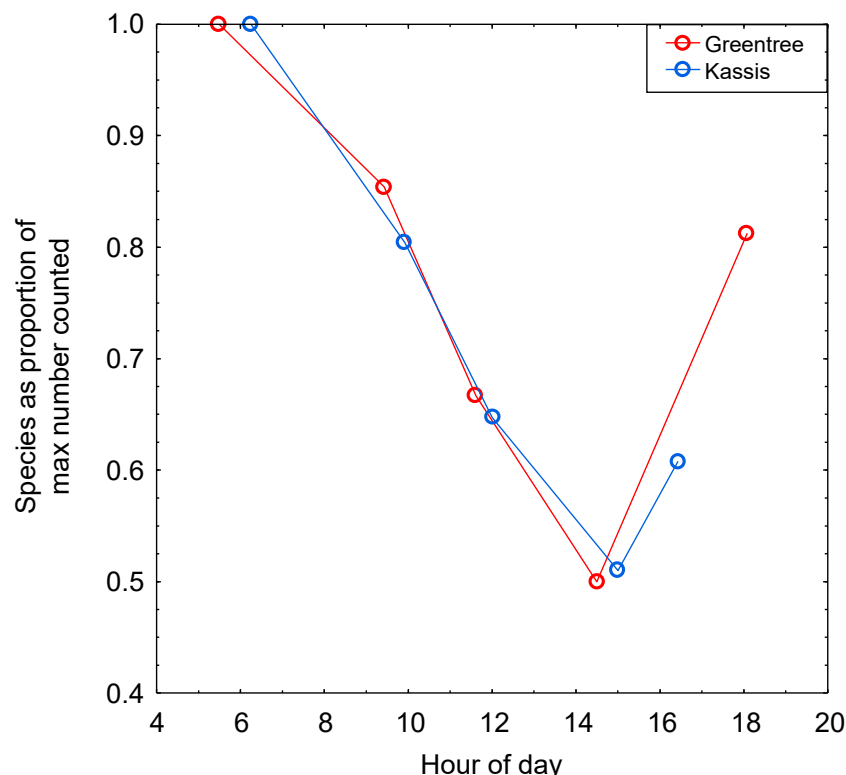


Table 1. Species of wildlife I observed during 3.9 hours of survey at a site 1,380 m north-northeast of the project site on 9 May 2024, and during 3.08 hours at a site 1,100 m north of the project site on 15 July 2018 and 16 July.

Common name	Species name	Status ¹	Notes
Western fence lizard	<i>Sceloporus occidentalis</i>		
Canada goose	<i>Branta canadensis</i>		Pair nesting
Mallard	<i>Anas platyrhynchos</i>		Flew to land at wastewater ponds
California quail	<i>Callipepla californica</i>		
Rock pigeon	<i>Columba livia</i>	Non-native	
Band-tailed pigeon	<i>Patagioenas fasciata</i>		Flock flew over
Eurasian collared-dove	<i>Streptopelia decaocto</i>	Non-native	
Mourning dove	<i>Zenaida macroura</i>		
White-throated swift	<i>Aeronautes saxatalis</i>		
Anna's hummingbird	<i>Calypte anna</i>		
American coot	<i>Fulica americana</i>		
Wild turkey	<i>Meleagris gallopavo</i>	Re-introduced	
Killdeer	<i>Charadrius vociferus</i>		
Greater yellowlegs	<i>Tringa melanoleuca</i>		
Bonaparte's gull	<i>Chroicocephalus philadelphia</i>		
California gull	<i>Larus californicus</i>	BCC, TWL	

Common name	Species name	Status ¹	Notes
Herring gull	<i>Larus argentatus</i>		
Forster's tern	<i>Sterna forsteri</i>		
Great egret	<i>Ardea alba</i>		Flyover
Double-crested cormorant	<i>Nannopterum auritum</i>	TWL	
Turkey vulture	<i>Cathartes aura</i>	BOP	
White-tailed kite	<i>Elanus leucurus</i>	CFP, BOP	
Northern harrier	<i>Circus cyaneus</i>	BCC, SSC3, BOP	Harassed turkey vulture, likely to defend nest
Cooper's hawk	<i>Accipiter cooperii</i>	TWL, BOP	Chased nesting RTHA
Red-tailed hawk	<i>Buteo jamaicensis</i>	BOP	Nest with at least 2 chicks
Swainson's hawk	<i>Buteo swainsoni</i>	CT, BOP	
Belted kingfisher	<i>Ceryle alcyon</i>		
American kestrel	<i>Falco sparverius</i>	BOP	
Western kingbird	<i>Tyrannus verticalis</i>		Nest in Eucalyptus
Black phoebe	<i>Sayornis nigricans</i>		
Say's phoebe	<i>Sayornis saya</i>		
California scrub-jay	<i>Aphelocoma californica</i>		Nesting
American crow	<i>Corvus brachyrhynchos</i>		
Common raven	<i>Corvus corax</i>		
Tree swallow	<i>Tachycineta bicolor</i>		Nesting
Northern rough-winged swallow	<i>Stelgidopteryx serripennis</i>		
Barn swallow	<i>Hirundo rustica</i>		
Cliff swallow	<i>Petrochelidon pyrrhonota</i>		
Oak titmouse	<i>Baeolophus inornatus</i>	BCC	
Bushtit	<i>Psaltiriparus minimus</i>		
Northern mockingbird	<i>Mimus polyglottos</i>		
European starling	<i>Sturnus vulgaris</i>	Non-native	
Western bluebird	<i>Sialia mexicana</i>		
Hermit thrush	<i>Catharus guttatus</i>		
American robin	<i>Turdus migratorius</i>		
Spotted towhee	<i>Pipilo maculatus</i>		
Purple finch	<i>Haemorhous purpureus</i>		
House finch	<i>Haemorhous mexicanus</i>		
Lesser goldfinch	<i>Spinus psaltria</i>		Collecting nest material
American goldfinch	<i>Spinus tristis</i>		
Samuel's song sparrow	<i>Melospiza melodia samuelis</i>	SSC3	
California towhee	<i>Melospiza crissalis</i>		
Bullock's oriole	<i>Icterus bullockii</i>		
Red-winged blackbird	<i>Agelaius phoeniceus</i>		Nesting

Common name	Species name	Status ¹	Notes
Brown-headed cowbird	<i>Molothrus ater</i>		
Brewer's blackbird	<i>Euphagus cyanocephalus</i>		
Great-tailed grackle	<i>Quiscalus mexicanus</i>		Fledglings
Western tanager	<i>Piranga ludoviciana</i>		
Black-headed grosbeak	<i>Pheucticus melanocephalus</i>		
Black-tailed jackrabbit	<i>Lepus californicus</i>		
Botta's pocket gopher	<i>Thomomys bottae</i>		
California vole	<i>Microtus californicus</i>		
Columbian black-tailed deer	<i>Odocoileus hemionus ssp. columbianus</i>		

¹ Listed as FT or FE = federal threatened or endangered, CT or CE = California threatened or endangered, CFP = California Fully Protected (CFG Code 3511), SSC = California Species of Special Concern, BCC = U.S. Fish and Wildlife Service Bird of Conservation Concern, TWL = Taxa to Watch List (Shuford and Gardali 2008), and BOP = Birds of Prey (California Fish and Game Code 3503.5).

Table 2. Species of wildlife I observed during an evening visit from 17:15 to 18:50 hours on 21 April 2018 at the site of the proposed Napa Airport Corporate Center, 2,200 m south of the project site. Blue-highlighted species are those I did not detect in survey results listed in Table 1.

Species	Scientific name	Status ¹
Great blue heron	<i>Ardea herodias</i>	
Great egret	<i>Casmerodius albus</i>	
Canada goose	<i>Branta canadensis</i>	
Mallard	<i>Anas platyrhynchos</i>	
Gadwall	<i>Anas strepera</i>	
Killdeer	<i>Charadrius vociferus</i>	
Greater yellowlegs	<i>Tringa melanoleuca</i>	
Turkey vulture	<i>Cathartes aura</i>	BOP
Cooper's hawk	<i>Accipiter cooperi</i>	BOP, TWL
Red-tailed hawk	<i>Buteo jamaicensis</i>	BOP
Red-shouldered hawk	<i>Buteo lineatus</i>	BOP
White-tailed kite	<i>Elanus leucurus</i>	CFP, TWL
American kestrel	<i>Falco sparverius</i>	BOP
Mourning dove	<i>Zenaida macroura</i>	
Rock pigeon	<i>Columba livea</i>	Non-native
Eurasian collared-dove	<i>Streptopelia decaocto</i>	Non-native
Black phoebe	<i>Sayornis nigricans</i>	
Barn swallow	<i>Hirundo rustica</i>	
Northern rough-winged swallow	<i>Stelgidopteryx serripennis</i>	
Cliff swallow	<i>Hirundo pyrrhonota</i>	
Common raven	<i>Corvus corax</i>	
American crow	<i>Corvus brachyrhynchos</i>	

Species	Scientific name	Status¹
American robin	<i>Turdus migratorius</i>	
Northern mockingbird	<i>Mimus polyglottos</i>	
European starling	<i>Sturnus vulgaris</i>	Non-native
White-crowned sparrow	<i>Zonotrichia leucophrys</i>	
Western meadowlark	<i>Sturnella neglecta</i>	
Red-winged blackbird	<i>Agelaius phoeniceus</i>	
Brewer's blackbird	<i>Euphagus cyanocephalus</i>	
Brown-headed cowbird	<i>Molothrus ater</i>	
American goldfinch	<i>Carduelis tristis</i>	
House finch	<i>Carpodacus mexicanus</i>	
Pocket gopher	<i>Thomomys bottae</i>	
Black-tailed jackrabbit	<i>Lepus californicus</i>	
Coyote	<i>Canis latrans</i>	
Western fence lizard	<i>Sceloporus occidentalis</i>	

¹ Listed as BOP = California Department of Fish and Wildlife Code 3503.5 (Birds of prey), TWL = Taxa to Watch List (Shuford and Gardali 2008).

Table 3. Species of wildlife I observed during visits on 23 January 2019 and 5 January 2021 at the site of the proposed SDG Commerce 217 Warehouse, during an offsite visit during my 2021 survey that includes a walk along Napa River and Bay Trails just south and west of the project site, during surveys conducted by myself (KSS), Monk & Associates (M&A), Pinecrest Research Corp, (PRC), and FirstCarbon Solutions (FCS). These surveys were completed only 4,345 m south-southeast of the E & P Technology Way project site. Blue-highlighted species are those I did not detect in survey results listed in Tables 1 and 2.

Species	Scientific name	Status ¹	KSS 2019	KSS 2021	KSS offsite 2019, 2021	M&A 2006- 2019	PRC 2023	FCS 2023
Sierran treefrog	<i>Pseudacris sierra</i>		X		X	X		
Western fence lizard	<i>Sceloporus occidentalis</i>					X		
Canada goose	<i>Branta canadensis</i>		X			X	X	X
Northern shoveler	<i>Anas chlypeata</i>				X			
Mallard	<i>Anas platyrhynchos</i>		X				X	X
California quail	<i>Callipepla californica</i>		X			X		
Wild turkey	<i>Meleagris gallopavo</i>	Non-native				X	X	
Pied-billed grebe	<i>Podilymbus podiceps</i>				X			
Ring-necked pheasant	<i>Phasianus colchicus</i>	Non-native				X		
Mourning dove	<i>Zenaida macroura</i>		X		X	X	X	X
Eurasian collared-dove	<i>Streptopelia decaocto</i>	Non-native	X			X		
Black-chinned hummingbird	<i>Archilochus alexandri</i>		X					
Anna's hummingbird	<i>Calypte anna</i>		X	X	X	X	X	X
Allen's hummingbird	<i>Selasphorus sasin</i>	BCC					X	
Virginia rail	<i>Rallus limicola</i>					X		
American coot	<i>Fulica americana</i>				X		X	X
Black-necked stilt	<i>Himantopus mexicanus</i>				X			
American avocet	<i>Recurvirostra americanus</i>				X			
Killdeer	<i>Charadrius vociferus</i>						X	
Long-billed dowitcher	<i>Limnodromus scolopaceus</i>				X			
Least sandpiper	<i>Caladris minutilla</i>				X			
Ring-billed gull	<i>Larus delawarensis</i>		X		X			

Species	Scientific name	Status¹	KSS 2019	KSS 2021	KSS offsite 2019, 2021	M&A 2006- 2019	PRC 2023	FCS 2023
California gull	<i>Larus californicus</i>	BCC, TWL					X	X
Herring gull	<i>Larus argentatus</i>		X		X			
American white pelican	<i>Pelicanus erythrorhynchos</i>	SSC1, BCC					X	X
Great blue heron	<i>Ardea herodias</i>					X	X	X
Turkey vulture	<i>Cathartes aura</i>	BOP			X	X	X	X
Osprey	<i>Pandion haliaetus</i>	TWL, BOP				X	X	
White-tailed kite	<i>Elanus leucurus</i>	CFP, BOP				X	X	X
Northern harrier	<i>Circus cyaneus</i>	BCC, SSC3, BOP	X		X			
Cooper's hawk	<i>Accipiter cooperii</i>	WL, BOP	X					
Bald eagle	<i>Haliaeetus leucocephalus</i>	CE, BGEPA, BOP	X					
Red-shouldered hawk	<i>Buteo lineatus</i>	BOP			X	X	X	X
Red-tailed hawk	<i>Buteo jamaicensis</i>	BOP	X	X	X	X	X	
Barn owl	<i>Tyto alba</i>	BOP				X		
Great horned owl	<i>Bubo virginianus</i>	BOP	X					
Belted kingfisher	<i>Ceryle alcyon</i>					X		
Nuttall's woodpecker	<i>Picoides nuttallii</i>	BCC	X		X	X	X	X
Northern flicker	<i>Colaptes auratus</i>		X	X	X	X	X	X
American kestrel	<i>Falco sparverius</i>	BOP	X		X	X		
Peregrine falcon	<i>Falco peregrinus</i>	BOP			X		X	
Black phoebe	<i>Sayornis nigricans</i>		X		X	X	X	X
Say's phoebe	<i>Sayornis saya</i>		X		X	X		
California scrub-jay	<i>Aphelocoma californica</i>		X			X	X	X
American crow	<i>Corvus brachyrhynchos</i>		X	X		X	X	X
Common raven	<i>Corvus corax</i>		X		X	X	X	X
Hutton's vireo	<i>Vireo huttoni</i>		X					
Chestnut-backed chickadee	<i>Poecile rufescens</i>					X	X	X
Tree swallow	<i>Tachycineta bicolor</i>					X	X	X

Species	Scientific name	Status¹	KSS 2019	KSS 2021	KSS offsite 2019, 2021	M&A 2006- 2019	PRC 2023	FCS 2023
Northern rough-winged swallow	<i>Stelgidopteryx serripennis</i>		X					
Violet-green swallow	<i>Tachycineta thalassina</i>						X	
Barn swallow	<i>Hirundo rustica</i>		X			X		
Cliff swallow	<i>Petrochelidon pyrrhonota</i>					X	X	X
Bushtit	<i>Psatriparus minimus</i>		X	X		X		
Wrentit	<i>Chamaea fasciata</i>	BCC				X		
Ruby-crowned kinglet	<i>Regulus calendula</i>					X	X	X
Cedar waxwing	<i>Bombycilla cedrorum</i>						X	X
Brown creeper	<i>Certhia americana</i>					X	X	
Rock wren	<i>Salpinctes obsoletus</i>						X	X
Bewick's wren	<i>Thryomanes bewickii</i>					X	X	X
House wren	<i>Troglodytes aedon</i>		X				X	X
Marsh wren	<i>Cistothorus palustris</i>				X	X		
Northern mockingbird	<i>Mimus polyglottos</i>		X		X	X	X	
European starling	<i>Sturnus vulgaris</i>	Non-native	X	X	X	X	X	X
Western bluebird	<i>Sialia mexicana</i>		X			X	X	X
Hermit thrush	<i>Catharus guttatus</i>						X	X
American robin	<i>Turdus migratorius</i>					X	X	X
House sparrow	<i>Passer domesticus</i>	Non-native				X	X	
American pipit	<i>Anthus rubescens</i>						X	
House finch	<i>Carpodacus mexicanus</i>		X		X	X	X	X
Purple finch	<i>Haemorhous purpureus</i>						X	X
Lesser goldfinch	<i>Carduelis psaltria</i>				X	X	X	X
American goldfinch	<i>Carduelis tristis</i>		X				X	X
Fox sparrow	<i>Passerella iliaca</i>				X		X	X
Dark-eyed junco	<i>Junco hyemalis</i>		X	X	X	X	X	X
White-crowned sparrow	<i>Zonotrichia leucophrys</i>		X		X	X	X	X
Golden-crowned sparrow	<i>Zonotrichia atricapilla</i>		X		X		X	X

Species	Scientific name	Status ¹	KSS 2019	KSS 2021	KSS offsite 2019, 2021	M&A 2006- 2019	PRC 2023	FCS 2023
Savannah sparrow	<i>Passerculus sandwichensis</i>					X		
Song sparrow	<i>Melospiza melodia</i>				X	X	X	X
Lincoln's sparrow	<i>Melospiza lincolnii</i>				X			
California towhee	<i>Pipilo crissalis</i>		X		X		X	X
Spotted towhee	<i>Pipilo maculatus</i>					X		
Western meadowlark	<i>Sturnella neglecta</i>		X					
Bullock's oriole	<i>Icterus bullockii</i>	BCC				X		
Red-winged blackbird	<i>Agelaius phoeniceus</i>		X		X	X	X	X
Brown-headed cowbird	<i>Molothrus ater</i>				X	X	X	X
Brewer's blackbird	<i>Euphagus cyanocephalus</i>		X		X	X	X	
Yellow-rumped warbler	<i>Setophaga coronata</i>		X	X	X	X	X	X
Black-tailed jackrabbit	<i>Lepus californicus</i>					X	X	X
Botta's pocket gopher	<i>Thomomys bottae</i>				X			
Western gray squirrel	<i>Sciurus griseus</i>					X		
California ground squirrel	<i>Otospermophilus beecheyi</i>				X	X		
Raccoon	<i>Procyon lotor</i>			X				
Coyote	<i>Canis latrans</i>					X		
House cat	<i>Felis catus</i>					X	X	X
Mule deer	<i>Odocoileus hemionus</i>						X	X
Columbian black-tailed deer	<i>Odocoileus hemionus ssp. columbianus</i>					X		
California vole	<i>Microtus californicus</i>						X	X

¹ Listed as FT or FE = federal threatened or endangered, CT or CE = California threatened or endangered, CFP = California Fully Protected (CFG Code 3511), SSC = California Species of Special Concern, BCC = U.S. Fish and Wildlife Service Bird of Conservation Concern, TWL = Taxa to Watch List (Shuford and Gardali 2008), and BOP = Birds of Prey (California Fish and Game Code 3503.5).

No surveys were performed for bats, nor were any live-trapping surveys performed for small mammals. With a single survey completed in December, no survey effort was made for reptiles.

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FirstCarbon Solutions (2024) is also inconsistent with its analysis. It reports on the one hand, "...the Sheehy Creek riparian corridor ... provide[s] high quality habitat for a variety of plant and animal species commonly associated with wetland and riparian habitats in the County." And on the other hand, it reports "The project area does not contain significant natural biological communities or habitat for special-status species due to the history of disking and lack of vegetation present currently ... Therefore, impacts to sensitive upland terrestrial biological communities in the footprint of the proposed development would not be anticipated." The Sheehy Creek riparian corridor is the foundation of a natural biological community (Ohmart 1994, Ballard et al. 2004, Andy 2020), and such communities do not function at anywhere close to full potential in isolation from neighboring uplands such as occur on the project site (Lee and Rotenberry 2015).

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Environmental Setting informed by Desktop Review

The purpose of literature and database review and of consulting with local experts is to inform the field survey, and to augment interpretation of its outcome. Analysts need this information to identify which species are known to have occurred at or near the project site, and to identify which other special-status species could conceivably occur at the site due to geographic range overlap and migration flight paths.

47

FirstCarbon Solutions (2024) does not report having reviewed eBird (<https://eBird.org>) or iNaturalist (<https://www.inaturalist.org>) for documented occurrence records at or near the project site. Instead, FirstCarbon Solutions (2024) queried the California Natural Diversity Data Base (CNDDDB) for documented occurrences of special-status species, but it did so within an unreported distance from the project site. I could not determine whether the query was to the project site, to the USGS Quad inclusive of the site, or within one or more Quads surrounding the Quad inclusive of the site. It is impossible to fully interpret the results of the CNDDDB query without knowing the locations on and around the project site that were reviewed on the database.

48

Moreover, by relying on the CNDDDB query, FirstCarbon Solutions (2024) screens out many special-status species from further consideration in the characterization of the wildlife community as part of the existing environmental setting (see the differences in species analyzed by myself and FirstCarbon Solutions in Table 4). The CNDDDB is not designed to support absence determinations or to screen out species from characterization of a site's wildlife community. As noted by the CNDDDB, "*The CNDDDB is a positive sighting database. It does not predict where something may be found. We map occurrences only where we have documentation that the species was found at the site. There are many areas of the state where no surveys have been conducted and therefore there is nothing on the map. That does not mean that there are no special status species present.*" FirstCarbon Solutions (2024) misuses the CNDDDB.

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The CNDDDB relies entirely on volunteer reporting from biologists who were allowed access to whatever properties they report from. Many properties have never been surveyed by biologists. Many properties have been surveyed, but the survey outcomes never reported to the CNDDDB. Many properties have been surveyed multiple times, but not all survey outcomes reported to the CNDDDB. Furthermore, the CNDDDB is interested only in the findings of special-status species, which means that species more recently assigned special status will have been reported many fewer times to the CNDDDB than were species assigned special status since the inception of the CNDDDB. The lack of many CNDDDB records for species recently assigned special status had nothing to do with whether the species' geographic ranges overlapped the project site, but rather more to do with the brief time for records to have accumulated since the species were assigned special status. And because negative findings are not reported to the CNDDDB, the CNDDDB cannot provide the basis for estimating occurrence likelihoods, either.

50

In my assessment based on database reviews and site visits, 125 special-status species of wildlife are known to occur near enough to the site to warrant analysis of occurrence potential (Table 4). Of these species, eight were recorded on or just next to the project site, and another 46 (37%) species have been documented within 1.5 miles of the site ('Very close'), another 25 (20%) within 1.5 and 4 miles ('Nearby'), and another 41 (33%) within 4 to 30 miles ('In region'). Nearly two-thirds (63%) of the species in Table 4 below have been reportedly seen within 4 miles of the project site. The site therefore supports multiple special-status species of wildlife, and it carries the potential for supporting many more special-status species of wildlife based on proximity of recorded occurrences. The site is far richer in special-status species than is characterized in FirstCarbon Solutions (2024).

51

FirstCarbon Solutions (2024) analyzes only 51 (41%) of the special-status species in Table 4 for occurrence potential, having omitted from its analysis 74 (59%) of the special-status species in Table 4. Of the species omitted from FirstCarbon Solutions's (2024) analysis, four have been recorded on the project site, 32 have been recorded within 1.5 miles of the site, 18 have been recorded between 1.5 and 4 miles of the site, and 20 have been recorded between 4 and 30 miles of the site. Of the 51 species analyzed for occurrence likelihood by FirstCarbon Solutions (2024), FirstCarbon Solutions (2024) determines only eight to have potential to occur, and six of these determined to have low potential. Of the seven special-status species determined to have low potential, three have been recorded within 1.5 miles of the project site. Of the 31 special-status species determined to have very low occurrence potential, three have been documented on the project site, eight have been recorded within 1.5 miles of the site, and three have been recorded between 1.5 and 4 miles of the site. Of the 13 special-status species FirstCarbon Solutions (2024) determines to have no potential for occurrence, one has been documented on the project site, two within 1.5 miles, and three between 1.5 and 4 miles from the site. On the whole, FirstCarbon Solutions (2024) analyses of occurrence likelihoods are inaccurate and fail to serve as a baseline for performing impacts analysis.

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Table 4. Occurrence likelihoods of special-status bird species at or near the proposed project site, according to eBird/iNaturalist records (<https://eBird.org>, <https://www.inaturalist.org>) and on-site survey findings, where “Very close” indicates within 1.5 miles of the site, “nearby” indicates within 1.5 and 4 miles, and “in region” indicates within 4 and 30 miles, and “in range” means the species’ geographic range overlaps the site.

Common name	Species name	Status ¹	IS/MND occurrence potential	Data base records, Site visits
Conservancy fairy shrimp	<i>Branchinecta conservatio</i>	FE		In region
Vernal pool fairy shrimp	<i>Branchinecta lynchi</i>	FT	None	In region
California freshwater shrimp	<i>Syncaris pacifica</i>	FE, CE	None	In region
Monarch	<i>Danaus plexippus</i>	FC	Very low	Nearby
Marin Elfin butterfly	<i>Callophrys mossii marinensis</i>	SSC	Very low	In region
Obscure bumble bee	<i>Bombus caliginosus</i>	SSC	Low	In region
Crotch’s bumble bee	<i>Bombus crotchii</i>	CCE	Medium	Nearby
Western bumble bee	<i>Bombus occidentalis</i>	CCE	Low	In range
California tiger salamander	<i>Ambystoma californiense</i>	FT, CT, WL	Very low	In region
California giant salamander	<i>Dicamptodon ensatus</i>	SSC	Very low	In region
Red-bellied newt	<i>Taricha rivularis</i>	SSC	None	In region
Foothill yellow-legged frog	<i>Rana boylei</i>	CT, SSC	Low	In region
California red-legged frog	<i>Rana draytonii</i>	FT, SSC	Low	In region
Western pond turtle	<i>Emys marmorata</i>	SSC	None	Nearby
Brant	<i>Branta bernicla</i>	SSC ₂		Nearby
Cackling goose (Aleutian)	<i>Branta hutchinsii leucopareia</i>	WL		Very close
Redhead	<i>Aythya americana</i>	SSC ₂		Very close
Harlequin duck	<i>Histrionicus histrionicus</i>	SSC ₂		In region
Barrow’s goldeneye	<i>Bucephala islandica</i>	SSC		Very close
Western grebe	<i>Aechmophorus occidentalis</i>	BCC		Very close
Clark’s grebe	<i>Aechmophorus clarkii</i>	BCC		Very close
Western yellow-billed cuckoo	<i>Coccyzus americanus occidentalis</i>	FT, CE	Very low	In region
Black swift	<i>Cypseloides niger</i>	SSC ₃ , BCC	None	Nearby
Vaux’s swift	<i>Chaetura vauxi</i>	SSC ₂		Very close
Calliope hummingbird	<i>Selasphorus calliope</i>	BCC		Nearby
Rufous hummingbird	<i>Selasphorus rufus</i>	BCC		Very close

Common name	Species name	Status ¹	IS/MND occurrence potential	Data base records, Site visits
Allen's hummingbird	<i>Selasphorus sasin</i>	BCC		Very close
Ridgway's rail (San Francisco Bay)	<i>Rallus obsoletus obsoletus</i>	FE, CE, CFP	None	Nearby
Yellow rail	<i>Coturnicops noveboracensis</i>	BCC, SSC	None	In region
Black oystercatcher	<i>Haematopus bachmani</i>	BCC		In region
Mountain plover	<i>Charadrius montanus</i>	SSC2, BCC		In region
Snowy plover	<i>Charadrius nivosus</i>	BCC		Nearby
Western snowy plover	<i>Charadrius nivosus nivosus</i>	FT, SSC	None	In region
Long-billed curlew	<i>Numenius americanus</i>	WL		Very close
Marbled godwit	<i>Limosa fedoa</i>	BCC		Very close
Black turnstone	<i>Arenaria melanocephala</i>	BCC		Nearby
Red knot (Pacific)	<i>Calidris canutus</i>	BCC		Nearby
Pectoral sandpiper	<i>Calidris melanotos</i>	BCC		Nearby
Short-billed dowitcher	<i>Limnodromus griseus</i>	BCC		Very close
Wandering tattler	<i>Tringa incana</i>	BCC		Nearby
Lesser yellowlegs	<i>Tringa flavipes</i>	BCC		Very close
Willet	<i>Tringa semipalmata</i>	BCC		Very close
Laughing gull	<i>Leucophaeus atricilla</i>	WL		In region
Heermann's gull	<i>Larus heermanni</i>	BCC		In region
Western gull	<i>Larus occidentalis</i>	BCC		Very close
California gull	<i>Larus californicus</i>	BCC, TWL		Very close
California least tern	<i>Sternula antillarum browni</i>	FE, CE, CFP		Nearby
Black tern	<i>Chlidonias niger</i>	SSC2, BCC		Nearby
Elegant tern	<i>Thalasseus elegans</i>	BCC, WL		Nearby
Black skimmer	<i>Rynchops niger</i>	BCC, SSC3		In region
Common loon	<i>Gavia immer</i>	SSC		Nearby
Brandt's cormorant	<i>Urile penicillatus</i>	BCC		In region
Double-crested cormorant	<i>Phalacrocorax auritus</i>	WL		Very close
American white pelican	<i>Pelicanus erythrorhynchos</i>	SSC1		Very close

Common name	Species name	Status ¹	IS/MND occurrence potential	Data base records, Site visits
California brown pelican	<i>Pelecanus occidentalis californicus</i>	FP		Nearby
Least bittern	<i>Ixobrychus exilis</i>	SSC2		In region
White-faced ibis	<i>Plegadis chihi</i>	WL		Very close
Turkey vulture	<i>Cathartes aura</i>	BOP		On site
Osprey	<i>Pandion haliaetus</i>	WL, BOP	Very low	Very close
White-tailed kite	<i>Elanus leucurus</i>	CFP, BOP	Very low	On site
Golden eagle	<i>Aquila chrysaetos</i>	BGEPA, CFP, BOP, WL	Low	Very close
Northern harrier	<i>Circus cyaneus</i>	BCC, SSC3, BOP	Low	Very close
Sharp-shinned hawk	<i>Accipiter striatus</i>	WL, BOP	Very low	On site
Cooper's hawk	<i>Accipiter cooperii</i>	WL, BOP	None	On site
Bald eagle	<i>Haliaeetus leucocephalus</i>	CE, BGEPA, BOP	Very low	Very close
Red-shouldered hawk	<i>Buteo lineatus</i>	BOP		Very close
Swainson's hawk	<i>Buteo swainsoni</i>	CT, BOP	Very low	On site
Red-tailed hawk	<i>Buteo jamaicensis</i>	BOP		On site
Ferruginous hawk	<i>Buteo regalis</i>	WL, BOP	Low	Very close
Rough-legged hawk	<i>Buteo lagopus</i>	BOP		Very close
American barn owl	<i>Tyto furcata</i>	BOP		Very close
Western screech-owl	<i>Megascops kennicotti</i>	BOP		Nearby
Great horned owl	<i>Bubo virginianus</i>	BOP		Very close
Burrowing owl	<i>Athene cunicularia</i>	BCC, SSC2, BOP, CCE	Very low	Very close - CNDDDB
Long-eared owl	<i>Asio otus</i>	BCC, SSC3, BOP		In region
Short-eared owl	<i>Asia flammeus</i>	BCC, SSC3, BOP		In region
Northern saw-whet owl	<i>Aegolius acadicus</i>	BOP		Nearby
Northern pygmy-owl	<i>Glaucidium gnoma</i>	BOP		Nearby
Lewis's woodpecker	<i>Melanerpes lewis</i>	BCC		Very close
Nuttall's woodpecker	<i>Picoides nuttallii</i>	BCC		Very close
American kestrel	<i>Falco sparverius</i>	BOP		On site
Merlin	<i>Falco columbarius</i>	WL, BOP		Very close

Common name	Species name	Status ¹	IS/MND occurrence potential	Data base records, Site visits
Peregrine falcon	<i>Falco peregrinus</i>	BOP	Very low	Very close
Prairie falcon	<i>Falco mexicanus</i>	WL, BOP	Very low	Very close
Olive-sided flycatcher	<i>Contopus cooperi</i>	BCC, SSC2		Nearby
Willow flycatcher	<i>Empidonax trailii</i>	CE		Very close
Vermilion flycatcher	<i>Pyrocephalus rubinus</i>	SSC2		In region
Loggerhead shrike	<i>Lanius ludovicianus</i>	SSC2		On site
Yellow-billed magpie	<i>Pica nuttalli</i>	BCC		In region
Oak titmouse	<i>Baeolophus inornatus</i>	BCC		Very close
California horned lark	<i>Eremophila alpestris actia</i>	WL	None	Very close
Bank swallow	<i>Riparia riparia</i>	CT	None	Very close
Purple martin	<i>Progne subis</i>	SSC2	Very low	Very close
Wrentit	<i>Chamaea fasciata</i>	BCC		Very close
California thrasher	<i>Toxostoma redivivum</i>	BCC		Very close
Cassin's finch	<i>Haemorhous cassinii</i>	BCC		In region
Lawrence's goldfinch	<i>Spinus lawrencei</i>	BCC		Very close
Grasshopper sparrow	<i>Ammodramus savannarum</i>	SSC2	Very low	Nearby
Samuel's song sparrow	<i>Melospiza melodia samuelis</i>	BCC, SSC	Very low	Very close
Black-chinned sparrow	<i>Spizella atrogularis</i>	BCC		In region
Bell's sparrow	<i>Amphispiza b. belli</i>	WL		Nearby
Yellow-breasted chat	<i>Icteria virens</i>	SSC3	Very low	Nearby
Yellow-headed blackbird	<i>Xanthocephalus xanthocephalus</i>	SSC3		Very close
Bullock's oriole	<i>Icterus bullockii</i>	BCC		Very close
Tricolored blackbird	<i>Agelaius tricolor</i>	CT, BCC, SSC1	Very low	Very close
Lucy's warbler	<i>Leiothlypis luciae</i>	SSC3		In region
Virginia's warbler	<i>Leiothlypis virginiae</i>	WL, BCC		In region
San Francisco common yellowthroat	<i>Geothlypis trichas sinuosa</i>	SSC3, BCC	Very low	In range
Yellow warbler	<i>Setophaga petechia</i>	SSC2	Very low	Very close
Summer tanager	<i>Piranga rubra</i>	SSC1		Nearby
Little brown bat	<i>Myotis lucifugus</i>	WBWG: M		In region

Common name	Species name	Status ¹	IS/MND occurrence potential	Data base records, Site visits
Yuma myotis	<i>Myotis yumanensis</i>	WBWG: LM	Very low	In region
Long-eared myotis	<i>Myotis evotis</i>	WBWG: M	Very low	In region
Fringed myotis	<i>Myotis thysanodes</i>	WBWG: H	Very low	In range
Long-legged myotis	<i>Myotis volans</i>	WBWG: H	Very low	In range
Canyon bat	<i>Parastrellus hesperus</i>	WBWG: M		In region
Silver-haired bat	<i>Lasionycteris noctivagans</i>	WBWG: M	Very low	In region
Hoary bat	<i>Lasiurus cinereus</i>	WBWG: M	Very low	In region
Western red bat	<i>Lasiurus blossevillei</i>	SSC, WBWG: H	Very low	In region
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	SSC, WBWG: H	Very low	In region
Pallid bat	<i>Antrozous pallidus</i>	SSC, WBWG: H	Very low	In region
Big free-tailed bat	<i>Nyctinomops macrotis</i>	SSC, WBWG: MH	Very low	In range
Salt-marsh harvest mouse	<i>Reithrodontomys raviventris</i>	FE, CE, FP	None	In region
American badger	<i>Taxidea taxus</i>	SSC	None	In region
Mountain lion	<i>Puma concolor</i>	SA		In region

¹ Listed as FT or FE = federal threatened or endangered, FC = federal candidate for listing, BCC = U.S. Fish and Wildlife Service Bird of Conservation Concern, CT or CE = California threatened or endangered, CCT or CCE = Candidate California threatened or endangered, CFP = California Fully Protected (California Fish and Game Code 3511), SSC = California Species of Special Concern (not threatened with extinction, but rare, very restricted in range, declining throughout range, peripheral portion of species' range, associated with habitat that is declining in extent), SSC1, SSC2 and SSC3 = California Bird Species of Special Concern priorities 1, 2 and 3, respectively (Shuford and Gardali 2008), WL = Taxa to Watch List (Shuford and Gardali 2008), and BOP = Birds of Prey (CFG Code 3503.5), and WBWG = Western Bat Working Group with priority rankings, of low (L), moderate (M), and high (H).

The occurrence likelihood analyses of FirstCarbon Solutions (2024) include too many errors and omissions:

- Western yellow-billed cuckoo is not only Endangered under CESA, but also Threatened under FESA;
- Bald eagle is not a California Species of Special Concern, but is listed as Endangered under CESA and protected by the Bald and Golden Eagle Protection Act and by California's Birds of Prey Code;
- Golden eagle is not a California Species of Special Concern, but is also California Fully Protected, protected by the Bald and Golden Eagle Protection Act and by California's Birds of Prey Code, and is on California's Watch List;
- Northern harrier is not listed as Threatened under FESA and CESA;
- Ferruginous hawk is not a California Species of Special Concern, but is protected by California's Birds of Prey Code, and is on California's Watch List;
- Burrowing owl is no longer just a California Species of Special Concern, but is now a Candidate for listing as Threatened or Endangered under CESA;
- Peregrine falcon is not a California Species of Special Concern, but is protected by California's Birds of Prey Code;
- Prairie falcon is not a California Species of Special Concern, but is protected by California's Birds of Prey Code and is on California's Watch List;
- The horned larks that occur in the Napa area are not the subspecies referred to as California horned lark, and the subspecies that is referred to as California horned lark is not a California Species of Special Concern;
- Bank swallow is not listed as Endangered in either the FESA or CESA, but rather as Threatened under CESA;
- Purple martin is not listed as Endangered in either the FESA or CESA, but rather as a California Species of Special Concern priority level 2;
- Tricolored blackbird is not only a California Species of Special Concern, but is also listed as Threatened under CESA and a USFWS Bird of Conservation Concern;
- Long-eared myotis is not a California Species of Special Concern, but is designated by the Western Bat Working Group as moderate conservation concern;

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- Fringed myotis is not a California Species of Special Concern, but is designated by the Western Bat Working Group as high conservation concern;
- Long-legged myotis is not a California Species of Special Concern, but is designated by the Western Bat Working Group as high conservation concern;
- Silver-haired bat is not a California Species of Special Concern, but is designated by the Western Bat Working Group as moderate conservation concern;
- Hoary bat is not a California Species of Special Concern, but it is designated by the Western Bat Working Group as moderate conservation concern.

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CONT

FirstCarbon Solutions (2024) also does not give valid reasons for why each of the special-status species it analyses should be determined to have no potential or low potential for occurrence. A frequent explanation is that the project site provides foraging habitat but no nesting habitat; however, this explanation introduces a contrived bifurcation of habitat that lacks scientific foundation. No animals can successfully breed without finding sufficient forage during the breeding and non-breeding seasons, and that also goes for winter migrants such as ferruginous hawk and merlin.

54

Another frequent explanation is that the project site fails to provide some habitat feature that FirstCarbon Solutions (2024) claims the species must have in order to survive. FirstCarbon Solutions (2024) describes the habitat of each species to be unrealistically narrow, and in so doing fails to cite sources in support of its habitat descriptions. For example, FirstCarbon Solutions (2024) explains that American badgers required “Open grassland habitats with plenty of prey,” and then claims that no suitable habitat occurs in the project area. It is unclear what “plenty of prey” means, or from where how this notion came about, but I have found American badgers in many environments such as grasslands, savannas, oak woodlands, conifer forests, chaparral, and on agricultural landscapes. FirstCarbon Solutions (2024) points out that the nearest record is two miles from the project site, insinuating that two miles is too far from the site to consider the occurrence of badgers as likely. Two miles is a trivial distance to American badgers, as it is about a fifth the distance foraging badger can cover in a night.

55

In another example, the occurrence likelihood of bald eagle is reportedly very low because “No suitable nesting or foraging habitat exists in the project area,” as according to FirstCarbon Solutions (2024: App. B), the species “Nests in forests, forages over lakes and streams.” I observed bald eagles at a research site for nearly 10 years. Bald eagles are not limited to forests for nesting, nor do they only forage over lakes and streams. In fact, they hunt ground squirrels and other mammals and birds on annual grasslands and other environments. I observed a bald eagle only 2.7 miles from the project site (Photos 1 and 2). A bald eagle only 2.7 miles from the project site is essentially at the project site. Bald eagles fly 2.7 miles in about five minutes.

56

The same determination based on the same reasoning is applied to peregrine falcon in FirstCarbon Solutions (2024). But again, I saw a peregrine falcon only 2.7 miles from the project site. The determination of very low likelihood of occurrence is inaccurate.

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Photos 1 and 2. A juvenile bald eagle flew along the eucalyptus trees only 2.7 miles south-southeast of the project site on 23 January 2019. On 5 January 2021, Bay Trail visitors informed me that two bald eagles had been living in the area that winter.



In another example, FirstCarbon solutions (2024: App. B) determines pond turtle to have no occurrence potential on the project site. This determination is inaccurate. Pond turtles occur in streams, and they nest on adjacent upland environments.

58

There are many other examples of occurrence likelihood determinations that are inaccurate and poorly founded, but I want to focus on two more examples – the burrowing owl and Swainson’s hawk. FirstCarbon solutions (2024: App. B) determines the occurrence likelihood of burrowing owl to be very low. No reason for this determination is provided other than the insinuation that the disturbed nature of the site would discourage burrowing owls. However, burrowing owls are well known to occur on disturbed soils (e.g., Smallwood and Morrison 2018). Furthermore, an occurrence record exists only 0.15 miles (240 m) from the project site. An occurrence record this close is essentially on the project site, because burrowing owls typically forage out to 400 m from their burrows. Regardless of whether one considers the occurrence record on site, even the determination of a very low occurrence likelihood -- which I dispute – warrants the implementation of the CDFW (2012) survey protocol.

59

There are three types of surveys recommended and described in the CDFW’s (2012) survey and mitigation guidelines: (1) Habitat assessment, (2) Detection surveys, and (3) Preconstruction survey. The habitat assessment is intended to evaluate the likelihood that the site supports burrowing owls, and to decide whether detection surveys should be performed. The detection surveys, otherwise described as either breeding-season or non-breeding-season surveys, are intended to detect whether the site truly supports burrowing owls, and if so where and how many. The preconstruction survey, otherwise known as a take-avoidance survey, is intended to determine whether burrowing owls immigrated to the site since completion of the detection survey, or returned to the site since passive or active relocations were performed as mitigation. The three types of survey carry distinct but inter-related purposes, and they are to be completed in chronological order.

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The first two types of survey support impacts analysis, whereas the third type of survey is a mitigation measure. Burrowing owls can be determined absent based on evidence derived from the habitat assessment or evidence derived from the detection survey, but only if the surveys achieved the minimum standards of CDFW (2012). Whereas an absence determination naturally follows from the negative findings of properly performed detection surveys, the following three questions drawn from CDFW (2012) must be answered negatively to determine absence based on the habitat assessment, which thus far is the only type of survey completed for burrowing owls at the project site:

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- A) Are there occurrence records nearby the project site?
- B) Is the site’s vegetation cover and height typical of where burrowing owls are found?
- C) Are there fossorial mammals present which typically construct burrows useable by burrowing owls, or are there surrogate cavities that can serve as nest sites?

If the answers to these questions are compellingly negative, then detection surveys are not necessary, but they could be implemented to make certain the site is absent of

burrowing owls. If the answers to these questions are affirmative or not compellingly negative, then it should be assumed that burrowing owl habitat exists on the site until detection surveys prove otherwise.

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CONT

The answer to question A is affirmative, as an occurrence record is located only 0.15 miles from the project site, which is essentially on the site. The answer to question B is affirmative, as the vegetation height on the project site is intentionally kept low for “weed abatement,” pretty much just the way burrowing owls like it. The answer to question C is unknown, as the reconnaissance survey of 8 December 2022 was grossly deficient and it was performed at a time of year when ground squirrels are least abundant and least active. I have seen ground squirrels near the project site, thereby indicating a higher likelihood of burrowing owl presence. With two of the three answers solidly affirmative, and answer to the third likely affirmative, burrowing owl habitat needs to be assumed on the site, followed by detection surveys consistent with CDFW (2012). Considering that a listing petition has been submitted to the California Fish and Game Commission in response to an ongoing rapid decline of burrowing owls across California (Miller 2024), and considering that CDFW (2024) endorsed consideration of the listing petition and the Commission voted unanimously to protect western burrowing owls throughout California as a “candidate” species under CESA on October 10, 2024, it is my opinion that the proposed project would result in potentially significant adverse impacts to burrowing owls unless breeding-season detection surveys are implemented to the standards of CDFW (2012).

62

Lastly in terms of examples, FirstCarbon Solutions (2024: App. B) determines the occurrence likelihood of Swainson’s hawk to be very low. Having researched Swainson’s hawks over many years (Smallwood 1995), it is my opinion that FirstCarbon Solutions’ habitat description is inaccurate. Swainson’s hawks forage over many more vegetation covers than grassland (Smallwood 1995). Moreover, Swainson’s hawks forage over disturbed ground, especially while the ground is undergoing disturbance (Smallwood 1995). FirstCarbon Solutions’ is also at odds with its reporting that the nearest Swainson’s hawk occurrence record is a mere 0.25 miles from the project site. In flight time, 0.25 miles is a matter of seconds before the Swainson’s hawk is over the project site.

63

At p. 9, the IS/MND attempts to defend the County’s failure to implement the Swainson’s hawk detection survey protocol as unnecessary: “This recovery success and expansion of SWHA range has been well-documented in other environmental documents from projects in the region, which have not been required to provide SWHA mitigation for foraging habitat.” However, I have read some of the other environmental documents from projects in the region, and the analysis in these documents lack a quantitative basis for the claim that Swainson’s hawks have been expanding in the project area. In fact, with all the new warehouses and other structures that have been recently added to the landscape, the notion that Swainson’s hawks have expanded in the area is hard to believe; Swainson’s hawks do not find forage on rooftops and blacktops.

64

The IS/MND (p. 9) attempts another approach to downplay the County’s failure to implement the appropriate survey and mitigation guidelines, “While Swainson’s hawk’s

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CONT
nests are protected, foraging habitat mitigation has generally not been required in the business park area.” However, this excuse is only an admission that the County has so far failed to comply with the CEQA by not implementing the CDFW (2000) survey and mitigation guidelines.

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Finally, the IS/MND (p 9) attempts to downplay potential impacts to Swainson’s hawks by claiming that the loss of 23.66 acres of foraging habitat would take only 0.16% of potential foraging habitat. I have to assume that the 0.16% figure would apply to an average Swainson’s hawk home range, as otherwise it makes no sense. If this is so, then the 0.16% of foraging habitat that is lost is the 0.16% that makes the difference between persistence and extirpation, then the 0.16% would be of critical importance. The IS/MND goes on to speculate wildly that there exists plenty of habitat of better quality located elsewhere. The Swainson’s hawks at issue are those that occur at the project site, and not somewhere else. The IS/MND’s speculations do not qualify as a serious analysis of potential impacts.

POTENTIALLY SIGNIFICANT BIOLOGICAL IMPACTS

67
An impacts analysis should consider whether and how a proposed project would affect members of a species, larger demographic units of the species, the whole of a species, and ecological communities. The accuracy of this analysis depends on an accurate characterization of the existing environmental setting. In the case of the proposed project, the existing environmental setting has not been accurately characterized, and several important types of potential project impacts have been inadequately analyzed. These types of impacts include habitat loss and wildlife-automobile collision mortality, discussed below.

HABITAT LOSS

68
FirstCarbon Solutions (2024) found that the proposed project will result in the loss of non-native, grassland and ruderal habitats, but the MND (p. 10) explains that the project site is previously disturbed, located within an existing industrial/business park, and there is “No evidence of wildlife corridors, raptor nests, wildlife dens, burrows or other unique or sensitive biological habitats or resources are located on site.” The MND (p. 10) therefore concludes that there would not be significant impacts to wildlife or other sensitive habitat.

69
The proposed project would result in potentially significant adverse biological impacts. Noriko Smallwood and I measured the impacts of habitat loss to wildlife caused by mitigated development projects, such as by industrial warehouses. We revisited 80 sites of proposed projects that we had originally surveyed in support of comments on CEQA review documents (Smallwood and Smallwood 2023). We revisited the sites to repeat the survey methods at the same time of year, the same start time in the day, and the same methods and survey duration to measure the effects of mitigated development on wildlife. We structured the experiment in a before-after, control-impact experimental design, as some of the sites had been developed since our initial survey and some had remained undeveloped. We found that mitigated development resulted in a 66% loss of

species on site, and 48% loss of species in the project area. Counts of vertebrate animals declined 90%. “Development impacts measured by the mean number of species detected per survey were greatest for amphibians (-100%), followed by mammals (-86%), grassland birds (-75%), raptors (-53%), special-status species (-49%), all birds as a group (-48%), non-native birds (-44%), and synanthropic birds (-28%). Our results indicated that urban development substantially reduced vertebrate species richness and numerical abundance, even after richness and abundance had likely already been depleted by the cumulative effects of loss, fragmentation, and degradation of habitat in the urbanizing environment,” and despite the mitigation measures per existing policies and regulations. We also specifically tested for the effects of projects to wildlife in neighboring habitats, and we found significant decreases in species richness and overall abundance in those areas as well.

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CONT

Habitat loss not only results in the immediate numerical decline of wildlife, but it also results in permanent loss of productive capacity. Habitat fragmentation multiplies the negative effects of habitat loss on the productive capacities of biological species by preventing recruitment to habitat patches that have become too isolated or too small (Smallwood 2015). In the case of birds, two methods exist for estimating the loss of productive capacity that would be caused by the project. One method would involve surveys to count the number of bird nests and chicks produced. The alternative method would be to infer productive capacity from estimates of total nest density elsewhere.

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Several studies have estimated total avian nest density at locations that had likewise been highly fragmented. Two study sites in grassland/wetland/woodland complexes within agricultural matrices had total bird nesting densities of 32.8 and 35.8 nests per acre (Young 1948, Yahner 1982) for an average 34.3 nests per acre. To acquire a total nest density closer to conditions in California, I surveyed various patches of vegetation cover in northern California throughout the breeding seasons of 2023 and 2024. I surveyed a 1.32-acre patch of riparian forest in Rancho Cordova where I estimated 28.79 nests/acre, a 2.95-acre patch of grassland/wetland adjacent to riparian forest east of Davis, where I estimated 5.08 nests/acre in 2024, and a 9.42-acre patch of annually disked grassland adjacent to riparian forest in Rancho Cordova, where I estimated 5.47 nests/acre. Applying 28.79 nests/acre to the 6.13 acres of riparian, and the mean 5.275 between my grassland estimates to the 14.2 acres of the project site covered by periodically disked grassland would predict an annual average 251 nest sites on the project site. Assuming 1.39 broods per nest site, which is the average among 322 North American bird species I asked Noriko Smallwood to review, then I predict the project would cost California 349 nest attempts/year.

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The loss of 251 nest sites and 349 nest attempts per year would qualify as significant impacts that have not been analyzed in the IS/MND. But the impacts would not end with the immediate loss of nest sites. The reproductive capacity of the site would be lost. The average number of fledglings per nest in Young’s (1948) study was 2.9. Assuming Young’s (1948) study site typifies bird productivity, the project would prevent the production of 41 fledglings per year. Assuming an average bird generation time of 5 years, the lost capacity of both breeders and annual fledgling production can be estimated from an equation in Smallwood (2022): $\{(nests/year \times chicks/nest \times number$

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of years) + (2 adults/nest × nests/year) × (number of years ÷ years/generation)} ÷
(number of years) = 1,113 birds per year denied to California.

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CONT

Most if not all the estimated 1,113 birds that annually could be lost to the project are protected by the federal Migratory Bird Treaty Act and by California's Migratory Bird Protection Act, both of which most strongly protect breeding migratory birds. It is my opinion that the proposed project would result in potentially significant adverse biological impacts.

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TRAFFIC IMPACTS TO WILDLIFE

Project-generated traffic would endanger wildlife that must, for various reasons, cross roads used by the project's traffic to get to and from the project site (Photos 3–5), including along roads far from the project footprint. Vehicle collisions have accounted for the deaths of many thousands of amphibian, reptile, mammal, bird, and arthropod fauna, and the impacts have often been found to be significant at the population level (Forman et al. 2003). Across North America traffic impacts have taken devastating tolls on wildlife (Forman et al. 2003). In Canada, 3,562 birds were estimated killed per 100 km of road per year (Bishop and Brogan 2013), and the US estimate of avian mortality on roads is 2,200 to 8,405 deaths per 100 km per year, or 89 million to 340 million total per year (Loss et al. 2014). Local impacts can be more intense than nationally.

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Photo 3. A Gambel's quail dashes across a road on 3 April 2021. Such road crossings are usually successful, but too often prove fatal to the animal. Photo by Noriko Smallwood.



Photo 4. Mourning dove killed by vehicle on a California road. Photo by Noriko Smallwood, 21 June 2020.





Photo 5. *Raccoon killed on Road 31 just east of Highway 505 in Solano County. Photo taken on 10 November 2018.*

The nearest study of traffic-caused wildlife mortality was performed along a 2.5-mile stretch of Vasco Road in Contra Costa County, California. Fatality searches in this study found 1,275 carcasses of 49 species of mammals, birds, amphibians and reptiles over 15 months of searches (Mendelsohn et al. 2009). This fatality number needs to be adjusted for the proportion of fatalities that were not found due to scavenger removal and searcher error. This adjustment is typically made by placing carcasses for searchers to find (or not find) during their routine periodic fatality searches. This step was not taken at Vasco Road (Mendelsohn et al. 2009), but it was taken as part of another study next to Vasco Road (Brown et al. 2016). Brown et al.'s (2016) adjustment factors for carcass persistence resembled those of Santos et al. (2011). Also applying searcher detection rates from Brown et al. (2016), the adjusted total number of fatalities was estimated at 9,462 animals killed by traffic on the road. This fatality number projected over 1.25 years and 2.5 miles of road translates to 3,028 wild animals per mile per year. In terms comparable to the national estimates, the estimates from the Mendelsohn et al. (2009) study would translate to 188,191 animals killed per 100 km of road per year, or 22 times that of Loss et al.'s (2014) upper bound estimate and 53 times the Canadian estimate. An analysis is needed of whether increased traffic generated by the project site would similarly result in local impacts on wildlife.

75

Special-status species that could suffer project-generated, traffic-collision mortality in the areas surrounding the project site include California tiger salamander, California red-legged frog, American badger, among many others listed in Table 4.

76

For wildlife vulnerable to front-end collisions and crushing under tires, road mortality can be predicted from the study of Mendelsohn et al. (2009) as a basis. My analysis of the Mendelsohn et al. (2009) data resulted in an estimated 3,028 animals killed per mile along a county road in Contra Costa County. The estimated numbers of fatalities were 1.75% birds, 26.4% mammals (many mice and pocket mice, but also ground squirrels, desert cottontails, striped skunks, American badgers, raccoons, and others), 67.4% amphibians (large numbers of California tiger salamanders and California red-legged frogs, but also Sierran treefrogs, western toads, arboreal salamanders, slender salamanders and others), and 4.4% reptiles (many western fence lizards, but also skinks, alligator lizards, and snakes of various species). VMT is useful for predicting wildlife mortality because I was able to quantify miles traveled along the studied reach of Vasco Road during the time period of the Mendelsohn et al. (2009) study, hence enabling a rate of fatalities per VMT that can be projected to other sites, assuming similar collision fatality rates.

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Predicting project-generated traffic impacts to wildlife

The IS/MND predicts 1,227 daily VMT for the winery and 1,345 daily VMT for the warehouse, which projected to a year predicts 938,780 annual VMT. During the Mendelsohn et al. (2009) study, 19,500 cars traveled Vasco Road daily, so the vehicle miles that contributed to my estimate of non-volant fatalities was 19,500 cars and trucks $\times 2.5 \text{ miles} \times 365 \text{ days/year} \times 1.25 \text{ years} = 22,242,187.5 \text{ vehicle miles}$ per 9,462 wildlife fatalities, or 2,351 vehicle miles per fatality. This rate divided into the predicted annual VMT would predict 399 vertebrate wildlife fatalities per year.

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Based on my analysis, the project-generated traffic may cause substantial, significant impacts to wildlife. The IS/MND does not analyze this potential impact, nor does it propose to mitigate it. Mitigation measures to improve wildlife safety along roads are available and are feasible, and they need exploration for their suitability with the proposed project. Given the predicted level of project-generated, traffic-caused mortality, and the lack of any proposed mitigation, it is my opinion that the proposed project would result in potentially significant adverse biological impacts.

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MITIGATION

Mitigation Measure BIO-1: *Install silt fencing along the Conservation Easement boundary to the riparian corridor.*

Should the project go forward, the silt fencing would need to be placed farther from the riparian corridor than the depicted in the IS/MND. According to Semlitsch and Bodie (2003), "Core terrestrial habitat [from aquatic habitat] ranged from 159 to 290 m for amphibians and from 127 to 289 m for reptiles from the edge of the aquatic site." To avoid direct impacts to terrestrial wildlife along the riparian corridor, I recommend the silt fence be placed 300 feet from the southern edge of the top of bank of Sheehy Creek.

80

Mitigation Measure BIO-2: *Implement CDFW (2018) as a preconstruction survey for rare plants.*

This measure misrepresents CDFW (2018) as a preconstruction survey rather than as a reconnaissance survey. The CDFW (2018) rare plant survey guidelines are intended to support the preparation of the CEQA review document. Implementation of CDFW (2018) would not qualify as a legitimate mitigation measure, as it was never intended to serve as a mitigation measure.

81

Mitigation Measure BIO-3: *Implement preconstruction survey for nesting birds, and if nests are found, a biologist shall establish buffers to construction activities.*

If the project goes forward, preconstruction surveys for nesting birds should be performed. However, the survey would not detect all of the available nests, nor would it prevent the loss of productive capacity I predict above under Habitat Loss.

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Furthermore, the language of this mitigation allows a single individual to make a subjective decision, outside the public's view, to determine the buffer area for any given species. This measure lacks objective criteria, and is unenforceable.

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CONT

Mitigation Measure BIO-6: *Implement CDFW (2012) habitat assessment and surveys for wintering burrowing owls.*

This measure makes little sense, and as written would not be consistent with CDFW (2012). A habitat assessment has already been completed, and the findings already warrant detection surveys. The detection surveys that are needed are breeding-season surveys consistent with CDFW's (2012) protocol. These surveys are intended to be completed prior to the issuance of the CEQA review document, not afterwards. The habitat assessment and detection surveys are not intended to be mitigation measures, as clearly stated in CDFW (2012).

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The burrowing owl has been designated a Candidate for listing as Threatened or Endangered under CESA. No take of burrowing owls is allowed. Detection surveys are needed during both the non-breeding and breeding periods, as well as a preconstruction take-avoidance survey.

Mitigation Measure BIO-8: *Install exclusion fencing during the wet season.*

Should the project go forward, exclusion fencing should be installed and monitored for integrity over the winter months, but passage would need to be accommodated from the project site toward Sheehy Creek, and prevented from Sheehy Creek toward the project site. Unless this one-way passage is enabled, the amphibians the fencing is installed to protect would instead trap the amphibians on the project site. Even if the fencing would prevent some amphibians from being crushed by heavy machinery, it would not avoid the loss of habitat along with the productive capacity of that habitat. The measure would not avoid a substantial, highly significant impact to amphibians such as to foothill yellow-legged frog. Compensatory mitigation would be warranted.

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Thank you for your attention,



Shawn Smallwood, Ph.D.

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Kenneth Shawn Smallwood Curriculum Vitae

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Born May 3, 1963 in
Sacramento, California.
Married, father of two.

Ecologist

Expertise

- Finding solutions to controversial problems related to wildlife interactions with human industry, infrastructure, and activities;
- Wildlife monitoring and field study using GPS, thermal imaging, behavior surveys;
- Using systems analysis and experimental design principles to identify meaningful ecological patterns that inform management decisions.

Education

Ph.D. Ecology, University of California, Davis. September 1990.
M.S. Ecology, University of California, Davis. June 1987.
B.S. Anthropology, University of California, Davis. June 1985.
Corcoran High School, Corcoran, California. June 1981.

Experience

- 480 professional publications, including:
 - 83 peer reviewed publications
 - 24 in non-reviewed proceedings
- 371 reports, declarations, posters and book reviews
- 8 in mass media outlets
- 87 public presentations of research results

Editing for scientific journals: Guest Editor, *Wildlife Society Bulletin*, 2012-2013, of invited papers representing international views on the impacts of wind energy on wildlife and how to mitigate the impacts. Associate Editor, *Journal of Wildlife Management*, March 2004 to 30 June 2007. Editorial Board Member, *Environmental Management*, 10/1999 to 8/2004. Associate Editor, *Biological Conservation*, 9/1994 to 9/1995.

Member, Alameda County Scientific Review Committee (SRC), August 2006 to April 2011. The five-member committee investigated causes of bird and bat collisions in the Altamont Pass Wind Resource Area, and recommended mitigation and monitoring measures. The SRC

reviewed the science underlying the Alameda County Avian Protection Program, and advised the County on how to reduce wildlife fatalities.

Consulting Ecologist, 2004-2007, California Energy Commission (CEC). Provided consulting services as needed to the CEC on renewable energy impacts, monitoring and research, and produced several reports. Also collaborated with Lawrence-Livermore National Lab on research to understand and reduce wind turbine impacts on wildlife.

Consulting Ecologist, 1999-2013, U.S. Navy. Performed endangered species surveys, hazardous waste site monitoring, and habitat restoration for the endangered San Joaquin kangaroo rat, California tiger salamander, California red-legged frog, California clapper rail, western burrowing owl, salt marsh harvest mouse, and other species at Naval Air Station Lemoore; Naval Weapons Station, Seal Beach, Detachment Concord; Naval Security Group Activity, Skaggs Island; National Radio Transmitter Facility, Dixon; and, Naval Outlying Landing Field Imperial Beach.

Part-time Lecturer, 1998-2005, California State University, Sacramento. Instructed Mammalogy, Behavioral Ecology, and Ornithology Lab, Contemporary Environmental Issues, Natural Resources Conservation.

Senior Ecologist, 1999-2005, BioResource Consultants. Designed and implemented research and monitoring studies related to avian fatalities at wind turbines, avian electrocutions on electric distribution poles across California, and avian fatalities at transmission lines.

Chairman, Conservation Affairs Committee, The Wildlife Society--Western Section, 1999-2001. Prepared position statements and led efforts directed toward conservation issues, including travel to Washington, D.C. to lobby Congress for more wildlife conservation funding.

Systems Ecologist, 1995-2000, Institute for Sustainable Development. Headed ISD's program on integrated resources management. Developed indicators of ecological integrity for large areas, using remotely sensed data, local community involvement and GIS.

Associate, 1997-1998, Department of Agronomy and Range Science, University of California, Davis. Worked with Shu Geng and Mingua Zhang on several studies related to wildlife interactions with agriculture and patterns of fertilizer and pesticide residues in groundwater across a large landscape.

Lead Scientist, 1996-1999, National Endangered Species Network. Informed academic scientists and environmental activists about emerging issues regarding the Endangered Species Act and other environmental laws. Testified at public hearings on endangered species issues.

Ecologist, 1997-1998, Western Foundation of Vertebrate Zoology. Conducted field research to determine the impact of past mercury mining on the status of California red-legged frogs in Santa Clara County, California.

Senior Systems Ecologist, 1994-1995, EIP Associates, Sacramento, California. Provided consulting services in environmental planning, and quantitative assessment of land units for their

conservation and restoration opportunities based on ecological resource requirements of 29 special-status species. Developed ecological indicators for prioritizing areas within Yolo County to receive mitigation funds for habitat easements and restoration.

Post-Graduate Researcher, 1990-1994, Department of Agronomy and Range Science, *U.C. Davis*. Under Dr. Shu Geng's mentorship, studied landscape and management effects on temporal and spatial patterns of abundance among pocket gophers and species of Falconiformes and Carnivora in the Sacramento Valley. Managed and analyzed a data base of energy use in California agriculture. Assisted with landscape (GIS) study of groundwater contamination across Tulare County, California.

Work experience in graduate school: Co-taught Conservation Biology with Dr. Christine Schonewald, 1991 & 1993, UC Davis Graduate Group in Ecology; Reader for Dr. Richard Coss's course on Psychobiology in 1990, UC Davis Department of Psychology; Research Assistant to Dr. Walter E. Howard, 1988-1990, UC Davis Department of Wildlife and Fisheries Biology, testing durable baits for pocket gopher management in forest clearcuts; Research Assistant to Dr. Terrell P. Salmon, 1987-1988, UC Wildlife Extension, Department of Wildlife and Fisheries Biology, developing empirical models of mammal and bird invasions in North America, and a rating system for priority research and control of exotic species based on economic, environmental and human health hazards in California. Student Assistant to Dr. E. Lee Fitzhugh, 1985-1987, UC Cooperative Extension, Department of Wildlife and Fisheries Biology, developing and implementing statewide mountain lion track count for long-term monitoring.

Fulbright Research Fellow, Indonesia, 1988. Tested use of new sampling methods for numerical monitoring of Sumatran tiger and six other species of endemic felids, and evaluated methods used by other researchers.

Projects

Repowering wind energy projects through careful siting of new wind turbines using map-based collision hazard models to minimize impacts to volant wildlife. Funded by wind companies (principally NextEra Renewable Energy, Inc.), California Energy Commission and East Bay Regional Park District, I have collaborated with a GIS analyst and managed a crew of five field biologists performing golden eagle behavior surveys and nocturnal surveys on bats and owls. The goal is to quantify flight patterns for development of predictive models to more carefully site new wind turbines in repowering projects. Focused behavior surveys began May 2012 and continue. Collision hazard models have been prepared for seven wind projects, three of which were built. Planning for additional repowering projects is underway.

Test avian safety of new mixer-ejector wind turbine (MEWT). Designed and implemented a before-after, control-impact experimental design to test the avian safety of a new, shrouded wind turbine developed by Ogin Inc. (formerly known as FloDesign Wind Turbine Corporation). Supported by a \$718,000 grant from the California Energy Commission's Public Interest Energy Research program and a 20% match share contribution from Ogin, I managed a crew of seven field biologists who performed periodic fatality searches and behavior surveys, carcass detection trials, nocturnal behavior surveys using a thermal camera, and spatial analyses with the collaboration of a GIS

analyst. Field work began 1 April 2012 and ended 30 March 2015 without Ogin installing its MEWTs, but we still achieved multiple important scientific advances.

Reduce avian mortality due to wind turbines at Altamont Pass. Studied wildlife impacts caused by 5,400 wind turbines at the world's most notorious wind resource area. Studied how impacts are perceived by monitoring and how they are affected by terrain, wind patterns, food resources, range management practices, wind turbine operations, seasonal patterns, population cycles, infrastructure management such as electric distribution, animal behavior and social interactions.

Reduce avian mortality on electric distribution poles. Directed research toward reducing bird electrocutions on electric distribution poles, 2000-2007. Oversaw 5 founts of fatality searches at 10,000 poles from Orange County to Glenn County, California, and produced two large reports.

Cook *et al.* v. Rockwell International *et al.*, No. 90-K-181 (D. Colorado). Provided expert testimony on the role of burrowing animals in affecting the fate of buried and surface-deposited radioactive and hazardous chemical wastes at the Rocky Flats Plant, Colorado. Provided expert reports based on four site visits and an extensive document review of burrowing animals. Conducted transect surveys for evidence of burrowing animals and other wildlife on and around waste facilities. Discovered substantial intrusion of waste structures by burrowing animals. I testified in federal court in November 2005, and my clients were subsequently awarded a \$553,000,000 judgment by a jury. After appeals the award was increased to two billion dollars.

Hanford Nuclear Reservation Litigation. Provided expert testimony on the role of burrowing animals in affecting the fate of buried radioactive wastes at the Hanford Nuclear Reservation, Washington. Provided three expert reports based on three site visits and extensive document review. Predicted and verified a certain population density of pocket gophers on buried waste structures, as well as incidence of radionuclide contamination in body tissue. Conducted transect surveys for evidence of burrowing animals and other wildlife on and around waste facilities. Discovered substantial intrusion of waste structures by burrowing animals.

Expert testimony and declarations on proposed residential and commercial developments, gas-fired power plants, wind, solar and geothermal projects, water transfers and water transfer delivery systems, endangered species recovery plans, Habitat Conservation Plans and Natural Communities Conservation Programs. Testified before multiple government agencies, Tribunals, Boards of Supervisors and City Councils, and participated with press conferences and depositions. Prepared expert witness reports and court declarations, which are summarized under Reports (below).

Protocol-level surveys for special-status species. Used California Department of Fish and Wildlife and US Fish and Wildlife Service protocols to search for California red-legged frog, California tiger salamander, arroyo southwestern toad, blunt-nosed leopard lizard, western pond turtle, giant kangaroo rat, San Joaquin kangaroo rat, San Joaquin kit fox, western burrowing owl, Swainson's hawk, Valley elderberry longhorn beetle and other special-status species.

Conservation of San Joaquin kangaroo rat. Performed research to identify factors responsible for the decline of this endangered species at Lemoore Naval Air Station, 2000-2013, and implemented habitat enhancements designed to reverse the trend and expand the population.

Impact of West Nile Virus on yellow-billed magpies. Funded by Sacramento-Yolo Mosquito and Vector Control District, 2005-2008, compared survey results pre- and post-West Nile Virus epidemic for multiple bird species in the Sacramento Valley, particularly on yellow-billed magpie and American crow due to susceptibility to WNV.

Workshops on HCPs. Assisted Dr. Michael Morrison with organizing and conducting a 2-day workshop on Habitat Conservation Plans, sponsored by Southern California Edison, and another 1-day workshop sponsored by PG&E. These Workshops were attended by academics, attorneys, and consultants with HCP experience. We guest-edited a Proceedings published in Environmental Management.

Mapping of biological resources along Highways 101, 46 and 41. Used GPS and GIS to delineate vegetation complexes and locations of special-status species along 26 miles of highway in San Luis Obispo County, 14 miles of highway and roadway in Monterey County, and in a large area north of Fresno, including within reclaimed gravel mining pits.

GPS mapping and monitoring at restoration sites and at Caltrans mitigation sites. Monitored the success of elderberry shrubs at one location, the success of willows at another location, and the response of wildlife to the succession of vegetation at both sites. Also used GPS to monitor the response of fossorial animals to yellow star-thistle eradication and natural grassland restoration efforts at Bear Valley in Colusa County and at the decommissioned Mather Air Force Base in Sacramento County.

Mercury effects on Red-legged Frog. Assisted Dr. Michael Morrison and US Fish and Wildlife Service in assessing the possible impacts of historical mercury mining on the federally listed California red-legged frog in Santa Clara County. Also measured habitat variables in streams.

Opposition to proposed No Surprises rule. Wrote a white paper and summary letter explaining scientific grounds for opposing the incidental take permit (ITP) rules providing ITP applicants and holders with general assurances they will be free of compliance with the Endangered Species Act once they adhere to the terms of a “properly functioning HCP.” Submitted 188 signatures of scientists and environmental professionals concerned about No Surprises rule US Fish and Wildlife Service, National Marine Fisheries Service, all US Senators.

Natomas Basin Habitat Conservation Plan alternative. Designed narrow channel marsh to increase the likelihood of survival and recovery in the wild of giant garter snake, Swainson’s hawk and Valley Elderberry Longhorn Beetle. The design included replication and interspersions of treatments for experimental testing of critical habitat elements. I provided a report to Northern Territories, Inc.

Assessments of agricultural production system and environmental technology transfer to China. Twice visited China and interviewed scientists, industrialists, agriculturalists, and the Directors of the Chinese Environmental Protection Agency and the Department of Agriculture to assess the need and possible pathways for environmental clean-up technologies and trade opportunities between the US and China.

Yolo County Habitat Conservation Plan. Conducted landscape ecology study of Yolo County to spatially prioritize allocation of mitigation efforts to improve ecosystem functionality within the

County from the perspective of 29 special-status species of wildlife and plants. Used a hierarchically structured indicators approach to apply principles of landscape and ecosystem ecology, conservation biology, and local values in rating land units. Derived GIS maps to help guide the conservation area design, and then developed implementation strategies.

Mountain lion track count. Developed and conducted a carnivore monitoring program throughout California since 1985. Species counted include mountain lion, bobcat, black bear, coyote, red and gray fox, raccoon, striped skunk, badger, and black-tailed deer. Vegetation and land use are also monitored. Track survey transect was established on dusty, dirt roads within randomly selected quadrats.

Sumatran tiger and other felids. Upon award of Fulbright Research Fellowship, I designed and initiated track counts for seven species of wild cats in Sumatra, including Sumatran tiger, fishing cat, and golden cat. Spent four months on Sumatra and Java in 1988, and learned Bahasa Indonesia, the official Indonesian language.

Wildlife in agriculture. Beginning as post-graduate research, I studied pocket gophers and other wildlife in 40 alfalfa fields throughout the Sacramento Valley, and I surveyed for wildlife along a 200 mile road transect since 1989 with a hiatus of 1996-2004. The data are analyzed using GIS and methods from landscape ecology, and the results published and presented orally to farming groups in California and elsewhere. I also conducted the first study of wildlife in cover crops used on vineyards and orchards.

Agricultural energy use and Tulare County groundwater study. Developed and analyzed a data base of energy use in California agriculture, and collaborated on a landscape (GIS) study of groundwater contamination across Tulare County, California.

Pocket gopher damage in forest clear-cuts. Developed gopher sampling methods and tested various poison baits and baiting regimes in the largest-ever field study of pocket gopher management in forest plantations, involving 68 research plots in 55 clear-cuts among 6 National Forests in northern California.

Risk assessment of exotic species in North America. Developed empirical models of mammal and bird species invasions in North America, as well as a rating system for assigning priority research and control to exotic species in California, based on economic, environmental, and human health hazards.

Peer Reviewed Publications

Smallwood, K. S. and M. L. Morrison. 2018. Nest-site selection in a high-density colony of burrowing owls. *Journal of Raptor Research* 52:454-470.

Smallwood, K. S., D. A. Bell, E. L. Walther, E. Leyvas, S. Standish, J. Mount, B. Karas. 2018. Estimating wind turbine fatalities using integrated detection trials. *Journal of Wildlife Management* 82:1169-1184.

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- Smallwood, K. S. 2013. Introduction: Wind-energy development and wildlife conservation. *Wildlife Society Bulletin* 37: 3-4.
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- Smallwood, K. S., L. Neher, J. Mount, and R. C. E. Culver. 2013. Nesting Burrowing Owl Abundance in the Altamont Pass Wind Resource Area, California. *Wildlife Society Bulletin*: 37:787-795.

- Smallwood, K. S., D. A. Bell, B. Karas, and S. A. Snyder. 2013. Response to Huso and Erickson Comments on Novel Scavenger Removal Trials. *Journal of Wildlife Management* 77: 216-225.
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Comments on Environmental Documents

I was retained or commissioned to comment on environmental planning and review documents, including:

- The Villages of Lakeview EIR (2017; 28 pp);
- Notes on Proposed Study Options for Trail Impacts on Northern Spotted Owl (2017; 4 pp);
- San Geronio Crossings EIR (2017; 22 pp);
- Replies to responses on Jupiter Project IS and MND (2017; 12 pp);
- MacArthur Transit Village Project Modified 2016 CEQA Analysis (2017; 12 pp);
- Central SoMa Plan DEIR (2017; 14 pp);
- Colony Commerce Center Specific Plan DEIR (2016; 16 pp);
- Fairway Trails Improvements MND (2016; 13 pp);
- Review of Avian-Solar Science Plan (2016; 28 pp);
- Replies to responses on Initial Study for Pyramid Asphalt (2016; 5 pp);
- Initial Study for Pyramid Asphalt (2016; 4 pp);
- Agua Mansa Distribution Warehouse Project Initial Study (2016; 14 pp);
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- CapRock Distribution Center III DEIR (2016; 12 pp);
- Orange Show Logistics Center Initial Study and MND (2016; 9 pp);
- City of Palmdale Oasis Medical Village Project IS and MND (2016; 7 pp);
- Comments on proposed rule for incidental eagle take (2016, 49 pp);
- Grapevine Specific and Community Plan FEIR (2016; 25 pp);
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- Hallmark at Shenandoah Warehouse Project Initial Study (2016; 6 pp);
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- Hidden Canyon Industrial Park Plot Plan 16-PP-02 (2016; 12 pp);
- Kimball Business Park DEIR (2016; 10 pp);
- Jupiter Project IS and MND (2016; 9 pp);
- Revised Draft Giant Garter Snake Recovery Plan of 2015 (2016, 18 pp);
- Palo Verde Mesa Solar Project Draft Environmental Impact Report (2016; 27 pp);

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- Proposed Section 24 Specific Plan Agua Caliente Band of Cahuilla Indians DEIS (2015, 9 pp);
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- Willow Springs Solar Photovoltaic Project DEIR (2015; 28 pp);
- Sierra Lakes Commerce Center Project DEIR (2015, 9 pp);
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- West Valley Logistics Center Specific Plan DEIR (2015, 10 pp);
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- Bay Delta Conservation Plan EIR/EIS (2014, 21 pp);
- Addison Wind Energy Project DEIR (2014, 32 pp);
- Response to Comments on the Addison Wind Energy Project DEIR (2014, 15 pp);
- Addison and Rising Tree Wind Energy Project FEIR (2014, 12 pp);
- Alta East Wind Energy Project FEIS (2013, 23 pp);
- Blythe Solar Power Project Staff Assessment, California Energy Commission (2013, 16 pp);
- Clearwater and Yakima Solar Projects DEIR (2013, 9 pp);
- Cuyama Solar Project DEIR (2014, 19 pp);
- Draft Desert Renewable Energy Conservation Plan (DRECP) EIR/EIS (2015, 49 pp);
- Kingbird Solar Photovoltaic Project EIR (2013, 19 pp);
- Lucerne Valley Solar Project Initial Study & Mitigated Negative Declaration (2013, 12 pp);
- Palen Solar Electric Generating System Final Staff Assessment of California Energy Commission, (2014, 20 pp);
- Rebuttal testimony on Palen Solar Energy Generating System (2014, 9 pp);
- Rising Tree Wind Energy Project DEIR (2014, 32 pp);
- Response to Comments on the Rising Tree Wind Energy Project DEIR (2014, 15 pp);
- Soitec Solar Development Project Draft PEIR (2014, 18 pp);
- Comment on the Biological Opinion (08ESMF-00-2012-F-0387) of Oakland Zoo expansion on Alameda whipsnake and California red-legged frog (2014; 3 pp);
- West Antelope Solar Energy Project Initial Study and Negative Declaration (2013, 18 pp);
- Willow Springs Solar Photovoltaic Project DEIR (2015, 28 pp);
- Alameda Creek Bridge Replacement Project DEIR (2015, 10 pp);
- Declaration on Tule Wind project FEIR/FEIS (2013; 24 pp);
- Sunlight Partners LANDPRO Solar Project Mitigated Negative Declaration (2013; 11 pp);
- Declaration in opposition to BLM fracking (2013; 5 pp);
- Rosamond Solar Project Addendum EIR (2013; 13 pp);
- Pioneer Green Solar Project EIR (2013; 13 pp);
- Reply to Staff Responses to Comments on Soccer Center Solar Project Mitigated Negative

- Declaration (2013; 6 pp);
- Soccer Center Solar Project Mitigated Negative Declaration (2013; 10 pp);
- Plainview Solar Works Mitigated Negative Declaration (2013; 10 pp);
- Reply to the County Staff's Responses on comments to Imperial Valley Solar Company 2 Project (2013; 10 pp);
- Imperial Valley Solar Company 2 Project (2013; 13 pp);
- FRV Orion Solar Project DEIR (PP12232) (2013; 9 pp);
- Casa Diablo IV Geothermal Development Project (2013; 6 pp);
- Reply to Staff Responses to Comments on Casa Diablo IV Geothermal Development Project (2013; 8 pp);
- FEIS prepared for Alta East Wind Project (2013; 23 pp);
- Metropolitan Air Park DEIR, City of San Diego (2013;);
- Davidon Homes Tentative Subdivision Map and Rezoning Project DEIR (2013; 9 pp);
- Analysis of Biological Assessment of Oakland Zoo Expansion Impacts on Alameda Whipsnake (2013; 10 pp);
- Declaration on Campo Verde Solar project FEIR (2013; 11pp);
- Neg Dec comments on Davis Sewer Trunk Rehabilitation (2013; 8 pp);
- Declaration on North Steens Transmission Line FEIS (2012; 62 pp);
- City of Lancaster Revised Initial Study for Conditional Use Permits 12-08 and 12-09, Summer Solar and Springtime Solar Projects (2012; 8 pp);
- J&J Ranch, 24 Adobe Lane Environmental Review (2012; 14 pp);
- Reply to the County Staff's Responses on comments to Hudson Ranch Power II Geothermal Project and the Simbol Calipatria Plant II (2012; 8 pp);
- Hudson Ranch Power II Geothermal Project and the Simbol Calipatria Plant II (2012; 9 pp);
- Desert Harvest Solar Project EIS (2012; 15 pp);
- Solar Gen 2 Array Project DEIR (2012; 16 pp);
- Ocotillo Sol Project EIS (2012; 4 pp);
- Beacon Photovoltaic Project DEIR (2012; 5 pp);
- Declaration on Initial Study and Proposed Negative Declaration for the Butte Water District 2012 Water Transfer Program (2012; 11 pp);
- Mount Signal and Calexico Solar Farm Projects DEIR (2011; 16 pp);
- City of Elk Grove Sphere of Influence EIR (2011; 28 pp);
- Comment on Sutter Landing Park Solar Photovoltaic Project MND (2011; 9 pp);
- Statement of Shawn Smallwood, Ph.D. Regarding Proposed Rabik/Gudath Project, 22611 Coleman Valley Road, Bodega Bay (CPN 10-0002) (2011; 4 pp);
- Declaration of K. Shawn Smallwood on Biological Impacts of the Ivanpah Solar Electric Generating System (ISEGS) (2011; 9 pp);
- Comments on Draft Eagle Conservation Plan Guidance (2011; 13 pp);
- Comments on Draft EIR/EA for Niles Canyon Safety Improvement Project (2011; 16 pp);
- Declaration of K. Shawn Smallwood, Ph.D., on Biological Impacts of the Route 84 Safety Improvement Project (2011; 7 pp);
- Rebuttal Testimony of Witness #22, K. Shawn Smallwood, Ph.D, on Behalf of Intervenors Friends of The Columbia Gorge & Save Our Scenic Area (2010; 6 pp);
- Prefiled Direct Testimony of Witness #22, K. Shawn Smallwood, Ph.D, on Behalf of

- Intervenors Friends of the Columbia Gorge & Save Our Scenic Area. Comments on Whistling Ridge Wind Energy Power Project DEIS, Skamania County, Washington (2010; 41 pp);
- Evaluation of Klickitat County's Decisions on the Windy Flats West Wind Energy Project (2010; 17 pp);
- St. John's Church Project Draft Environmental Impact Report (2010; 14 pp.);
- Initial Study/Mitigated Negative Declaration for Results Radio Zone File #2009-001 (2010; 20 pp);
- Rio del Oro Specific Plan Project Final Environmental Impact Report (2010;12 pp);
- Answers to Questions on 33% RPS Implementation Analysis Preliminary Results Report (2009; 9 pp);
- SEPA Determination of Non-significance regarding zoning adjustments for Skamania County, Washington. Second Declaration to Friends of the Columbia Gorge, Inc. and Save Our Scenic Area (Dec 2008; 17 pp);
- Comments on Draft 1A Summary Report to CAISO (2008; 10 pp);
- County of Placer's Categorical Exemption of Hilton Manor Project (2009; 9 pp);
- Protest of CARE to Amendment to the Power Purchase and Sale Agreement for Procurement of Eligible Renewable Energy Resources Between Hatchet Ridge Wind LLC and PG&E (2009; 3 pp);
- Tehachapi Renewable Transmission Project EIR/EIS (2009; 142 pp);
- Delta Shores Project EIR, south Sacramento (2009; 11 pp + addendum 2 pp);
- Declaration of Shawn Smallwood in Support of Care's Petition to Modify D.07-09-040 (2008; 3 pp);
- The Public Utility Commission's Implementation Analysis December 16 Workshop for the Governor's Executive Order S-14-08 to implement a 33% Renewable Portfolio Standard by 2020 (2008; 9 pp);
- The Public Utility Commission's Implementation Analysis Draft Work Plan for the Governor's Executive Order S-14-08 to implement a 33% Renewable Portfolio Standard by 2020 (2008; 11 pp);
- Draft 1A Summary Report to California Independent System Operator for Planning Reserve Margins (PRM) Study (2008; 7 pp.);
- SEPA Determination of Non-significance regarding zoning adjustments for Skamania County, Washington. Declaration to Friends of the Columbia Gorge, Inc. and Save Our Scenic Area (Sep 2008; 16 pp);
- California Energy Commission's Preliminary Staff Assessment of the Colusa Generating Station (2007; 24 pp);
- Rio del Oro Specific Plan Project Recirculated Draft Environmental Impact Report (2008; 66 pp);
- Replies to Response to Comments Re: Regional University Specific Plan Environmental Impact Report (2008; 20 pp);
- Regional University Specific Plan Environmental Impact Report (2008; 33 pp.);
- Clark Precast, LLC's "Sugarland" project, Negative Declaration (2008; 15 pp.);
- Cape Wind Project Draft Environmental Impact Statement (2008; 157 pp.);
- Yuba Highlands Specific Plan (or Area Plan) Environmental Impact Report (2006; 37 pp.);
- Replies to responses to comments on Mitigated Negative Declaration of the proposed

- Mining Permit (MIN 04-01) and Modification of Use Permit 96-02 at North Table Mountain (2006; 5 pp);
- Mitigated Negative Declaration of the proposed Mining Permit (MIN 04-01) and Modification of Use Permit 96-02 at North Table Mountain (2006; 15 pp);
- Windy Point Wind Farm Environmental Review and EIS (2006; 14 pp and 36 Powerpoint slides in reply to responses to comments);
- Shiloh I Wind Power Project EIR (2005; 18 pp);
- Buena Vista Wind Energy Project Notice of Preparation of EIR (2004; 15 pp);
- Negative Declaration of the proposed Callahan Estates Subdivision (2004; 11 pp);
- Negative Declaration of the proposed Winters Highlands Subdivision (2004; 9 pp);
- Negative Declaration of the proposed Winters Highlands Subdivision (2004; 13 pp);
- Negative Declaration of the proposed Creekside Highlands Project, Tract 7270 (2004; 21 pp);
- On the petition California Fish and Game Commission to list the Burrowing Owl as threatened or endangered (2003; 10 pp);
- Conditional Use Permit renewals from Alameda County for wind turbine operations in the Altamont Pass Wind Resource Area (2003; 41 pp);
- UC Davis Long Range Development Plan of 2003, particularly with regard to the Neighborhood Master Plan (2003; 23 pp);
- Anderson Marketplace Draft Environmental Impact Report (2003: 18 pp + 3 plates of photos);
- Negative Declaration of the proposed expansion of Temple B'nai Tikyah (2003: 6 pp);
- Antonio Mountain Ranch Specific Plan Public Draft EIR (2002: 23 pp);
- Response to testimony of experts at the East Altamont Energy Center evidentiary hearing on biological resources (2002: 9 pp);
- Revised Draft Environmental Impact Report, The Promenade (2002: 7 pp);
- Recirculated Initial Study for Calpine's proposed Pajaro Valley Energy Center (2002: 3 pp);
- UC Merced -- Declaration of Dr. Shawn Smallwood in support of petitioner's application for temporary restraining order and preliminary injunction (2002: 5 pp);
- Replies to response to comments in Final Environmental Impact Report, Atwood Ranch Unit III Subdivision (2003: 22 pp);
- Draft Environmental Impact Report, Atwood Ranch Unit III Subdivision (2002: 19 pp + 8 photos on 4 plates);
- California Energy Commission Staff Report on GWF Tracy Peaker Project (2002: 17 pp + 3 photos; follow-up report of 3 pp);
- Initial Study and Negative Declaration, Silver Bend Apartments, Placer County (2002: 13 pp);
- UC Merced Long-range Development Plan DEIR and UC Merced Community Plan DEIR (2001: 26 pp);
- Initial Study, Colusa County Power Plant (2001: 6 pp);
- Comments on Proposed Dog Park at Catlin Park, Folsom, California (2001: 5 pp + 4 photos);
- Pacific Lumber Co. (Headwaters) Habitat Conservation Plan and Environmental Impact Report (1998: 28 pp);
- Final Environmental Impact Report/Statement for Issuance of Take authorization for listed

- species within the MSCP planning area in San Diego County, California (Fed. Reg. 62 (60): 14938, San Diego Multi-Species Conservation Program) (1997: 10 pp);
- Permit (PRT-823773) Amendment for the Natomas Basin Habitat Conservation Plan, Sacramento, CA (Fed. Reg. 63 (101): 29020-29021) (1998);
 - Draft Recovery Plan for the Giant Garter Snake (*Thamnophis gigas*). (Fed. Reg. 64(176): 49497-49498) (1999: 8 pp);
 - Review of the Draft Recovery Plan for the Arroyo Southwestern Toad (*Bufo microscaphus californicus*) (1998);
 - Ballona West Bluffs Project Environmental Impact Report (1999: oral presentation);
 - California Board of Forestry's proposed amended Forest Practices Rules (1999);
 - Negative Declaration for the Sunset Sky Ranch Airport Use Permit (1999);
 - Calpine and Bechtel Corporations' Biological Resources Implementation and Monitoring Program (BRMIMP) for the Metcalf Energy Center (2000: 10 pp);
 - California Energy Commission's Final Staff Assessment of the proposed Metcalf Energy Center (2000);
 - US Fish and Wildlife Service Section 7 consultation with the California Energy Commission regarding Calpine and Bechtel Corporations' Metcalf Energy Center (2000: 4 pp);
 - California Energy Commission's Preliminary Staff Assessment of the proposed Metcalf Energy Center (2000: 11 pp);
 - Site-specific management plans for the Natomas Basin Conservancy's mitigation lands, prepared by Wildlands, Inc. (2000: 7 pp);
 - Affidavit of K. Shawn Smallwood in Spirit of the Sage Council, et al. (Plaintiffs) vs. Bruce Babbitt, Secretary, U.S. Department of the Interior, et al. (Defendants), Injuries caused by the No Surprises policy and final rule which codifies that policy (1999: 9 pp).

Comments on other Environmental Review Documents:

- Proposed Regulation for California Fish and Game Code Section 3503.5 (2015: 12 pp);
- Statement of Overriding Considerations related to extending Altamont Winds, Inc.'s Conditional Use Permit PLN2014-00028 (2015; 8 pp);
- Draft Program Level EIR for Covell Village (2005; 19 pp);
- Bureau of Land Management Wind Energy Programmatic EIS Scoping document (2003: 7 pp.);
- NEPA Environmental Analysis for Biosafety Level 4 National Biocontainment Laboratory (NBL) at UC Davis (2003: 7 pp);
- Notice of Preparation of UC Merced Community and Area Plan EIR, on behalf of The Wildlife Society—Western Section (2001: 8 pp.);
- Preliminary Draft Yolo County Habitat Conservation Plan (2001; 2 letters totaling 35 pp.);
- Merced County General Plan Revision, notice of Negative Declaration (2001: 2 pp.);
- Notice of Preparation of Campus Parkway EIR/EIS (2001: 7 pp.);
- Draft Recovery Plan for the bighorn sheep in the Peninsular Range (*Ovis candensis*) (2000);
- Draft Recovery Plan for the California Red-legged Frog (*Rana aurora draytonii*), on behalf of The Wildlife Society—Western Section (2000: 10 pp.);
- Sierra Nevada Forest Plan Amendment Draft Environmental Impact Statement, on behalf of The Wildlife Society—Western Section (2000: 7 pp.);

- State Water Project Supplemental Water Purchase Program, Draft Program EIR (1997);
- Davis General Plan Update EIR (2000);
- Turn of the Century EIR (1999: 10 pp);
- Proposed termination of Critical Habitat Designation under the Endangered Species Act (Fed. Reg. 64(113): 31871-31874) (1999);
- NOA Draft Addendum to the Final Handbook for Habitat Conservation Planning and Incidental Take Permitting Process, termed the HCP 5-Point Policy Plan (Fed. Reg. 64(45): 11485 - 11490) (1999; 2 pp + attachments);
- Covell Center Project EIR and EIR Supplement (1997).

Position Statements I prepared the following position statements for the Western Section of The Wildlife Society, and one for nearly 200 scientists:

- Recommended that the California Department of Fish and Game prioritize the extermination of the introduced southern water snake in northern California. The Wildlife Society--Western Section (2001);
- Recommended that The Wildlife Society—Western Section appoint or recommend members of the independent scientific review panel for the UC Merced environmental review process (2001);
- Opposed the siting of the University of California’s 10th campus on a sensitive vernal pool/grassland complex east of Merced. The Wildlife Society--Western Section (2000);
- Opposed the legalization of ferret ownership in California. The Wildlife Society--Western Section (2000);
- Opposed the Proposed “No Surprises,” “Safe Harbor,” and “Candidate Conservation Agreement” rules, including permit-shield protection provisions (Fed. Reg. Vol. 62, No. 103, pp. 29091-29098 and No. 113, pp. 32189-32194). This statement was signed by 188 scientists and went to the responsible federal agencies, as well as to the U.S. Senate and House of Representatives.

Posters at Professional Meetings

Leyvas, E. and K. S. Smallwood. 2015. Rehabilitating injured animals to offset and rectify wind project impacts. Conference on Wind Energy and Wildlife Impacts, Berlin, Germany, 9-12 March 2015.

Smallwood, K. S., J. Mount, S. Standish, E. Leyvas, D. Bell, E. Walther, B. Karas. 2015. Integrated detection trials to improve the accuracy of fatality rate estimates at wind projects. Conference on Wind Energy and Wildlife Impacts, Berlin, Germany, 9-12 March 2015.

Smallwood, K. S. and C. G. Thelander. 2005. Lessons learned from five years of avian mortality research in the Altamont Pass WRA. AWEA conference, Denver, May 2005.

Neher, L., L. Wilder, J. Woo, L. Spiegel, D. Yen-Nakafugi, and K.S. Smallwood. 2005. Bird’s eye view on California wind. AWEA conference, Denver, May 2005.

Smallwood, K. S., C. G. Thelander and L. Spiegel. 2003. Toward a predictive model of avian

fatalities in the Altamont Pass Wind Resource Area. Windpower 2003 Conference and Convention, Austin, Texas.

Smallwood, K.S. and Eva Butler. 2002. Pocket Gopher Response to Yellow Star-thistle Eradication as part of Grassland Restoration at Decommissioned Mather Air Force Base, Sacramento County, California. White Mountain Research Station Open House, Barcroft Station.

Smallwood, K.S. and Michael L. Morrison. 2002. Fresno kangaroo rat (*Dipodomys nitratoide*s) Conservation Research at Resources Management Area 5, Lemoore Naval Air Station. White Mountain Research Station Open House, Barcroft Station.

Smallwood, K.S. and E.L. Fitzhugh. 1989. Differentiating mountain lion and dog tracks. Third Mountain Lion Workshop, Prescott, AZ.

Smith, T. R. and K. S. Smallwood. 2000. Effects of study area size, location, season, and allometry on reported *Sorex* shrew densities. Annual Meeting of the Western Section of The Wildlife Society.

Presentations at Professional Meetings and Seminars

Repowering the Altamont Pass. Altamont Symposium, The Wildlife Society – Western Section, 5 February 2017.

Developing methods to reduce bird mortality in the Altamont Pass Wind Resource Area, 1999-2007. Altamont Symposium, The Wildlife Society – Western Section, 5 February 2017.

Conservation and recovery of burrowing owls in Santa Clara Valley. Santa Clara Valley Habitat Agency, Newark, California, 3 February 2017.

Mitigation of Raptor Fatalities in the Altamont Pass Wind Resource Area. Raptor Research Foundation Meeting, Sacramento, California, 6 November 2015.

From burrows to behavior: Research and management for burrowing owls in a diverse landscape. California Burrowing Owl Consortium meeting, 24 October 2015, San Jose, California.

The Challenges of repowering. Keynote presentation at Conference on Wind Energy and Wildlife Impacts, Berlin, Germany, 10 March 2015.

Research Highlights Altamont Pass 2011-2015. Scientific Review Committee, Oakland, California, 8 July 2015.

Siting wind turbines to minimize raptor collisions: Altamont Pass Wind Resource Area. US Fish and Wildlife Service Golden Eagle Working Group, Sacramento, California, 8 January 2015.

Evaluation of nest boxes as a burrowing owl conservation strategy. Sacramento Chapter of the Western Section, The Wildlife Society. Sacramento, California, 26 August 2013.

Predicting collision hazard zones to guide repowering of the Altamont Pass. Conference on wind

power and environmental impacts. Stockholm, Sweden, 5-7 February 2013.

Impacts of Wind Turbines on Wildlife. California Council for Wildlife Rehabilitators, Yosemite, California, 12 November 2012.

Impacts of Wind Turbines on Birds and Bats. Madrone Audubon Society, Santa Rosa, California, 20 February 2012.

Comparing Wind Turbine Impacts across North America. California Energy Commission Staff Workshop: Reducing the Impacts of Energy Infrastructure on Wildlife, 20 July 2011.

Siting Repowered Wind Turbines to Minimize Raptor Collisions. California Energy Commission Staff Workshop: Reducing the Impacts of Energy Infrastructure on Wildlife, 20 July 2011.

Siting Repowered Wind Turbines to Minimize Raptor Collisions. Alameda County Scientific Review Committee meeting, 17 February 2011

Comparing Wind Turbine Impacts across North America. Conference on Wind energy and Wildlife impacts, Trondheim, Norway, 3 May 2011.

Update on Wildlife Impacts in the Altamont Pass Wind Resource Area. Raptor Symposium, The Wildlife Society—Western Section, Riverside, California, February 2011.

Siting Repowered Wind Turbines to Minimize Raptor Collisions. Raptor Symposium, The Wildlife Society - Western Section, Riverside, California, February 2011.

Wildlife mortality caused by wind turbine collisions. Ecological Society of America, Pittsburgh, Pennsylvania, 6 August 2010.

Map-based repowering and reorganization of a wind farm to minimize burrowing owl fatalities. California burrowing Owl Consortium Meeting, Livermore, California, 6 February 2010.

Environmental barriers to wind power. Getting Real About Renewables: Economic and Environmental Barriers to Biofuels and Wind Energy. A symposium sponsored by the Environmental & Energy Law & Policy Journal, University of Houston Law Center, Houston, 23 February 2007.

Lessons learned about bird collisions with wind turbines in the Altamont Pass and other US wind farms. Meeting with Japan Ministry of the Environment and Japan Ministry of the Economy, Wild Bird Society of Japan, and other NGOs Tokyo, Japan, 9 November 2006.

Lessons learned about bird collisions with wind turbines in the Altamont Pass and other US wind farms. Symposium on bird collisions with wind turbines. Wild Bird Society of Japan, Tokyo, Japan, 4 November 2006.

Responses of Fresno kangaroo rats to habitat improvements in an adaptive management framework. California Society for Ecological Restoration (SERCAL) 13th Annual Conference, UC Santa

Barbara, 27 October 2006.

Fatality associations as the basis for predictive models of fatalities in the Altamont Pass Wind Resource Area. EEI/APLIC/PIER Workshop, 2006 Biologist Task Force and Avian Interaction with Electric Facilities Meeting, Pleasanton, California, 28 April 2006.

Burrowing owl burrows and wind turbine collisions in the Altamont Pass Wind Resource Area. The Wildlife Society - Western Section Annual Meeting, Sacramento, California, February 8, 2006.

Mitigation at wind farms. Workshop: Understanding and resolving bird and bat impacts. American Wind Energy Association and Audubon Society. Los Angeles, CA. January 10 and 11, 2006.

Incorporating data from the California Wildlife Habitat Relationships (CWHR) system into an impact assessment tool for birds near wind farms. Shawn Smallwood, Kevin Hunting, Marcus Yee, Linda Spiegel, Monica Parisi. Workshop: Understanding and resolving bird and bat impacts. American Wind Energy Association and Audubon Society. Los Angeles, CA. January 10 and 11, 2006.

Toward indicating threats to birds by California's new wind farms. California Energy Commission, Sacramento, May 26, 2005.

Avian collisions in the Altamont Pass. California Energy Commission, Sacramento, May 26, 2005.

Ecological solutions for avian collisions with wind turbines in the Altamont Pass Wind Resource Area. EPRI Environmental Sector Council, Monterey, California, February 17, 2005.

Ecological solutions for avian collisions with wind turbines in the Altamont Pass Wind Resource Area. The Wildlife Society—Western Section Annual Meeting, Sacramento, California, January 19, 2005.

Associations between avian fatalities and attributes of electric distribution poles in California. The Wildlife Society - Western Section Annual Meeting, Sacramento, California, January 19, 2005.

Minimizing avian mortality in the Altamont Pass Wind Resources Area. UC Davis Wind Energy Collaborative Forum, Palm Springs, California, December 14, 2004.

Selecting electric distribution poles for priority retrofitting to reduce raptor mortality. Raptor Research Foundation Meeting, Bakersfield, California, November 10, 2004.

Responses of Fresno kangaroo rats to habitat improvements in an adaptive management framework. Annual Meeting of the Society for Ecological Restoration, South Lake Tahoe, California, October 16, 2004.

Lessons learned from five years of avian mortality research at the Altamont Pass Wind Resources Area in California. The Wildlife Society Annual Meeting, Calgary, Canada, September 2004.

The ecology and impacts of power generation at Altamont Pass. Sacramento Petroleum Association,

Sacramento, California, August 18, 2004.

Burrowing owl mortality in the Altamont Pass Wind Resource Area. California Burrowing Owl Consortium meeting, Hayward, California, February 7, 2004.

Burrowing owl mortality in the Altamont Pass Wind Resource Area. California Burrowing Owl Symposium, Sacramento, November 2, 2003.

Raptor Mortality at the Altamont Pass Wind Resource Area. National Wind Coordinating Committee, Washington, D.C., November 17, 2003.

Raptor Behavior at the Altamont Pass Wind Resource Area. Annual Meeting of the Raptor Research Foundation, Anchorage, Alaska, September, 2003.

Raptor Mortality at the Altamont Pass Wind Resource Area. Annual Meeting of the Raptor Research Foundation, Anchorage, Alaska, September, 2003.

California mountain lions. Ecological & Environmental Issues Seminar, Department of Biology, California State University, Sacramento, November, 2000.

Intra- and inter-turbine string comparison of fatalities to animal burrow densities at Altamont Pass. National Wind Coordinating Committee, Carmel, California, May, 2000.

Using a Geographic Positioning System (GPS) to map wildlife and habitat. Annual Meeting of the Western Section of The Wildlife Society, Riverside, CA, January, 2000.

Suggested standards for science applied to conservation issues. Annual Meeting of the Western Section of The Wildlife Society, Riverside, CA, January, 2000.

The indicators framework applied to ecological restoration in Yolo County, California. Society for Ecological Restoration, September 25, 1999.

Ecological restoration in the context of animal social units and their habitat areas. Society for Ecological Restoration, September 24, 1999.

Relating Indicators of Ecological Health and Integrity to Assess Risks to Sustainable Agriculture and Native Biota. International Conference on Ecosystem Health, August 16, 1999.

A crosswalk from the Endangered Species Act to the HCP Handbook and real HCPs. Southern California Edison, Co. and California Energy Commission, March 4-5, 1999.

Mountain lion track counts in California: Implications for Management. Ecological & Environmental Issues Seminar, Department of Biological Sciences, California State University, Sacramento, November 4, 1998.

“No Surprises” -- Lack of science in the HCP process. California Native Plant Society Annual Conservation Conference, The Presidio, San Francisco, September 7, 1997.

In Your Interest. A half hour weekly show aired on Channel 10 Television, Sacramento. In this episode, I served on a panel of experts discussing problems with the implementation of the Endangered Species Act. Aired August 31, 1997.

Spatial scaling of pocket gopher (*Geomyidae*) density. Southwestern Association of Naturalists 44th Meeting, Fayetteville, Arkansas, April 10, 1997.

Estimating prairie dog and pocket gopher burrow volume. Southwestern Association of Naturalists 44th Meeting, Fayetteville, Arkansas, April 10, 1997.

Ten years of mountain lion track survey. Fifth Mountain Lion Workshop, San Diego, February 27, 1996.

Study and interpretive design effects on mountain lion density estimates. Fifth Mountain Lion Workshop, San Diego, February 27, 1996.

Small animal control. Session moderator and speaker at the California Farm Conference, Sacramento, California, Feb. 28, 1995.

Small animal control. Ecological Farming Conference, Asylomar, California, Jan. 28, 1995.

Habitat associations of the Swainson's Hawk in the Sacramento Valley's agricultural landscape. 1994 Raptor Research Foundation Meeting, Flagstaff, Arizona.

Alfalfa as wildlife habitat. Seed Industry Conference, Woodland, California, May 4, 1994.

Habitats and vertebrate pests: impacts and management. Managing Farmland to Bring Back Game Birds and Wildlife to the Central Valley. Yolo County Resource Conservation District, U.C. Davis, February 19, 1994.

Management of gophers and alfalfa as wildlife habitat. Orland Alfalfa Production Meeting and Sacramento Valley Alfalfa Production Meeting, February 1 and 2, 1994.

Patterns of wildlife movement in a farming landscape. Wildlife and Fisheries Biology Seminar Series: Recent Advances in Wildlife, Fish, and Conservation Biology, U.C. Davis, Dec. 6, 1993.

Alfalfa as wildlife habitat. California Alfalfa Symposium, Fresno, California, Dec. 9, 1993.

Management of pocket gophers in Sacramento Valley alfalfa. California Alfalfa Symposium, Fresno, California, Dec. 8, 1993.

Association analysis of raptors in a farming landscape. Plenary speaker at Raptor Research Foundation Meeting, Charlotte, North Carolina, Nov. 6, 1993.

Landscape strategies for biological control and IPM. Plenary speaker, International Conference on Integrated Resource Management and Sustainable Agriculture, Beijing, China, Sept. 11, 1993.

Landscape Ecology Study of Pocket Gophers in Alfalfa. Alfalfa Field Day, U.C. Davis, July 1993.

Patterns of wildlife movement in a farming landscape. Spatial Data Analysis Colloquium, U.C. Davis, August 6, 1993.

Sound stewardship of wildlife. Veterinary Medicine Seminar: Ethics of Animal Use, U.C. Davis. May 1993.

Landscape ecology study of pocket gophers in alfalfa. Five County Grower's Meeting, Tracy, California. February 1993.

Turbulence and the community organizers: The role of invading species in ordering a turbulent system, and the factors for invasion success. Ecology Graduate Student Association Colloquium, U.C. Davis. May 1990.

Evaluation of exotic vertebrate pests. Fourteenth Vertebrate Pest Conference, Sacramento, California. March 1990.

Analytical methods for predicting success of mammal introductions to North America. The Western Section of the Wildlife Society, Hilo, Hawaii. February 1988.

A state-wide mountain lion track survey. Sacramento County Dept Parks and Recreation. April 1986.

The mountain lion in California. Davis Chapter of the Audubon Society. October 1985.

Ecology Graduate Student Seminars, U.C. Davis, 1985-1990: Social behavior of the mountain lion; Mountain lion control; Political status of the mountain lion in California.

Other forms of Participation at Professional Meetings

- Scientific Committee, Conference on Wind energy and Wildlife impacts, Berlin, Germany, March 2015.
- Scientific Committee, Conference on Wind energy and Wildlife impacts, Stockholm, Sweden, February 2013.
- Workshop co-presenter at Birds & Wind Energy Specialist Group (BAWESG) Information sharing week, Bird specialist studies for proposed wind energy facilities in South Africa, Endangered Wildlife Trust, Darling, South Africa, 3-7 October 2011.
- Scientific Committee, Conference on Wind energy and Wildlife impacts, Trondheim, Norway, 2-5 May 2011.
- Chair of Animal Damage Management Session, The Wildlife Society, Annual Meeting, Reno, Nevada, September 26, 2001.

- Chair of Technical Session: Human communities and ecosystem health: Comparing perspectives and making connection. Managing for Ecosystem Health, International Congress on Ecosystem Health, Sacramento, CA August 15-20, 1999.
- Student Awards Committee, Annual Meeting of the Western Section of The Wildlife Society, Riverside, CA, January, 2000.
- Student Mentor, Annual Meeting of the Western Section of The Wildlife Society, Riverside, CA, January, 2000.

Printed Mass Media

Smallwood, K.S., D. Mooney, and M. McGuinness. 2003. We must stop the UCD biolab now. Op-Ed to the Davis Enterprise.

Smallwood, K.S. 2002. Spring Lake threatens Davis. Op-Ed to the Davis Enterprise.

Smallwood, K.S. Summer, 2001. Mitigation of habitation. The Flatlander, Davis, California.

Entrikan, R.K. and K.S. Smallwood. 2000. Measure O: Flawed law would lock in new taxes. Op-Ed to the Davis Enterprise.

Smallwood, K.S. 2000. Davis delegation lobbies Congress for Wildlife conservation. Op-Ed to the Davis Enterprise.

Smallwood, K.S. 1998. Davis Visions. The Flatlander, Davis, California.

Smallwood, K.S. 1997. Last grab for Yolo's land and water. The Flatlander, Davis, California.

Smallwood, K.S. 1997. The Yolo County HCP. Op-Ed to the Davis Enterprise.

Radio/Television

PBS News Hour,

FOX News, Energy in America: Dead Birds Unintended Consequence of Wind Power Development, August 2011.

KXJZ Capital Public Radio -- Insight (Host Jeffrey Callison). Mountain lion attacks (with guest Professor Richard Coss). 23 April 2009;

KXJZ Capital Public Radio -- Insight (Host Jeffrey Callison). Wind farm Rio Vista Renewable Power. 4 September 2008;

KQED QUEST Episode #111. Bird collisions with wind turbines. 2007;

KDVS Speaking in Tongues (host Ron Glick), Yolo County HCP: 1 hour. December 27, 2001;

KDVS Speaking in Tongues (host Ron Glick), Yolo County HCP: 1 hour. May 3, 2001;

KDVS Speaking in Tongues (host Ron Glick), Yolo County HCP: 1 hour. February 8, 2001;

KDVS Speaking in Tongues (host Ron Glick & Shawn Smallwood), California Energy Crisis: 1 hour. Jan. 25, 2001;

KDVS Speaking in Tongues (host Ron Glick), Headwaters Forest HCP: 1 hour. 1998;

Davis Cable Channel (host Gerald Heffernon), Burrowing owls in Davis: half hour. June, 2000;

Davis Cable Channel (hosted by Davis League of Women Voters), Measure O debate: 1 hour. October, 2000;

KXTV 10, In Your Interest, The Endangered Species Act: half hour. 1997.

Reviews of Journal Papers (Scientific journals for whom I've provided peer review)

Journal	Journal
American Naturalist	Journal of Animal Ecology
Journal of Wildlife Management	Western North American Naturalist
Auk	Journal of Raptor Research
Biological Conservation	National Renewable Energy Lab reports
Canadian Journal of Zoology	Oikos
Ecosystem Health	The Prairie Naturalist
Environmental Conservation	Restoration Ecology
Environmental Management	Southwestern Naturalist
Functional Ecology	The Wildlife Society--Western Section Trans.
Journal of Zoology (London)	Proc. Int. Congress on Managing for Ecosystem Health
Journal of Applied Ecology	Transactions in GIS
Ecology	Tropical Ecology
Wildlife Society Bulletin	Peer J
Biological Control	The Condor

Committees

- Scientific Review Committee, Alameda County, Altamont Pass Wind Resource Area
- Ph.D. Thesis Committee, Steve Anderson, University of California, Davis
- MS Thesis Committee, Marcus Yee, California State University, Sacramento

Other Professional Activities or Products

Testified in Federal Court in Denver during 2005 over the fate of radio-nuclides in the soil at Rocky Flats Plant after exposure to burrowing animals. My clients won a judgment of \$553,000,000. I have also testified in many other cases of litigation under CEQA, NEPA, the Warren-Alquist Act, and other environmental laws. My clients won most of the cases for which I testified.

Testified before Environmental Review Tribunals in Ontario, Canada regarding proposed White Pines, Amherst Island, and Fairview Wind Energy projects.

Testified in Skamania County Hearing in 2009 on the potential impacts of zoning the County for development of wind farms and hazardous waste facilities.

Testified in deposition in 2007 in the case of O'Dell et al. vs. FPL Energy in Houston, Texas.

Testified in Klickitat County Hearing in 2006 on the potential impacts of the Windy Point Wind Farm.

Memberships in Professional Societies

The Wildlife Society
Raptor Research Foundation

Honors and Awards

Fulbright Research Fellowship to Indonesia, 1987
J.G. Boswell Full Academic Scholarship, 1981 college of choice
Certificate of Appreciation, The Wildlife Society—Western Section, 2000, 2001
Northern California Athletic Association Most Valuable Cross Country Runner, 1984
American Legion Award, Corcoran High School, 1981, and John Muir Junior High, 1977
CIF Section Champion, Cross Country in 1978
CIF Section Champion, Track & Field 2 mile run in 1981
National Junior Record, 20 kilometer run, 1982
National Age Group Record, 1500 meter run, 1978

Community Activities

District 64 Little League Umpire, 2003-2007
Dixon Little League Umpire, 2006-07
Davis Little League Chief Umpire and Board member, 2004-2005
Davis Little League Safety Officer, 2004-2005
Davis Little League Certified Umpire, 2002-2004
Davis Little League Scorekeeper, 2002
Davis Visioning Group member
Petitioner for Writ of Mandate under the California Environmental Quality Act against City of Woodland decision to approve the Spring Lake Specific Plan, 2002
Served on campaign committees for City Council candidates

Representative Clients/Funders

Law Offices of Stephan C. Volker Blum Collins, LLP Eric K. Gillespie Professional Corporation Law Offices of Berger & Montague Lozeau Drury LLP Law Offices of Roy Haber Law Offices of Edward MacDonald Law Office of John Gabrielli Law Office of Bill Kopper Law Office of Donald B. Mooney Law Office of Veneruso & Moncharsh Law Office of Steven Thompson Law Office of Brian Gaffney California Wildlife Federation Defenders of Wildlife Sierra Club National Endangered Species Network Spirit of the Sage Council The Humane Society Hagens Berman LLP Environmental Protection Information Center Goldberg, Kamin & Garvin, Attorneys at Law Californians for Renewable Energy (CARE) Seatuck Environmental Association Friends of the Columbia Gorge, Inc. Save Our Scenic Area Alliance to Protect Nantucket Sound Friends of the Swainson's Hawk Alameda Creek Alliance Center for Biological Diversity California Native Plant Society Endangered Wildlife Trust and BirdLife South Africa AquAlliance Oregon Natural Desert Association Save Our Sound G3 Energy and Pattern Energy Emerald Farms Pacific Gas & Electric Co. Southern California Edison Co. Georgia-Pacific Timber Co. Northern Territories Inc. David Magney Environmental Consulting Wildlife History Foundation NextEra Energy Resources, LLC Ogin, Inc.	EDF Renewables National Renewable Energy Lab Altamont Winds LLC Salka Energy Comstocks Business (magazine) BioResource Consultants Tierra Data Black and Veatch Terry Preston, Wildlife Ecology Research Center EcoStat, Inc. US Navy US Department of Agriculture US Forest Service US Fish & Wildlife Service US Department of Justice California Energy Commission California Office of the Attorney General California Department of Fish & Wildlife California Department of Transportation California Department of Forestry California Department of Food & Agriculture Ventura County Counsel County of Yolo Tahoe Regional Planning Agency Sustainable Agriculture Research & Education Program Sacramento-Yolo Mosquito and Vector Control District East Bay Regional Park District County of Alameda Don & LaNelle Silverstien Seventh Day Adventist Church Escuela de la Raza Unida Susan Pelican and Howard Beeman Residents Against Inconsistent Development, Inc. Bob Sarvey Mike Boyd Hillcroft Neighborhood Fund Joint Labor Management Committee, Retail Food Industry Lisa Rocca Kevin Jackson Dawn Stover and Jay Letto Nancy Havassy Catherine Portman (for Brenda Cedarblade) Ventus Environmental Solutions, Inc. Panorama Environmental, Inc. Adams Broadwell Professional Corporation
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Representative special-status species experience

Common name	Species name	Description
Field experience		
California red-legged frog	<i>Rana aurora draytonii</i>	Protocol searches; Many detections
Foothill yellow-legged frog	<i>Rana boylei</i>	Presence surveys; Many detections
Western spadefoot	<i>Spea hammondi</i>	Presence surveys; Few detections
California tiger salamander	<i>Ambystoma californiense</i>	Protocol searches; Many detections
Coast range newt	<i>Taricha torosa torosa</i>	Searches and multiple detections
Blunt-nosed leopard lizard	<i>Gambelia sila</i>	Detected in San Luis Obispo County
California horned lizard	<i>Phrynosoma coronatum frontale</i>	Searches; Many detections
Western pond turtle	<i>Clemmys marmorata</i>	Searches; Many detections
San Joaquin kit fox	<i>Vulpes macrotis mutica</i>	Protocol searches; detections
Sumatran tiger	<i>Panthera tigris</i>	Track surveys in Sumatra
Mountain lion	<i>Puma concolor californicus</i>	Research and publications
Point Arena mountain beaver	<i>Aplodontia rufa nigra</i>	Remote camera operation
Giant kangaroo rat	<i>Dipodomys ingens</i>	Detected in Cholame Valley
San Joaquin kangaroo rat	<i>Dipodomys nitratoideus</i>	Monitoring & habitat restoration
Monterey dusky-footed woodrat	<i>Neotoma fuscipes luciana</i>	Non-target captures and mapping of dens
Salt marsh harvest mouse	<i>Reithrodontomys raviventris</i>	Habitat assessment, monitoring
Salinas harvest mouse	<i>Reithrodontomys megalotus distichlus</i>	Captures; habitat assessment
Bats		Thermal imaging surveys
California clapper rail	<i>Rallus longirostris</i>	Surveys and detections
Golden eagle	<i>Aquila chrysaetos</i>	Numerical & behavioral surveys
Swainson's hawk	<i>Buteo swainsoni</i>	Numerical & behavioral surveys
Northern harrier	<i>Circus cyaneus</i>	Numerical & behavioral surveys
White-tailed kite	<i>Elanus leucurus</i>	Numerical & behavioral surveys
Loggerhead shrike	<i>Lanius ludovicianus</i>	Large area surveys
Least Bell's vireo	<i>Vireo bellii pusillus</i>	Detected in Monterey County
Willow flycatcher	<i>Empidonax traillii eximius</i>	Research at Sierra Nevada breeding sites
Burrowing owl	<i>Athene cunicularia hypuglia</i>	Numerical & behavioral surveys
Valley elderberry longhorn beetle	<i>Desmocerus californicus dimorphus</i>	Monitored success of relocation and habitat restoration
Analytical		
Arroyo southwestern toad	<i>Bufo microscaphus californicus</i>	Research and report.
Giant garter snake	<i>Thamnophis gigas</i>	Research and publication
Northern goshawk	<i>Accipiter gentilis</i>	Research and publication
Northern spotted owl	<i>Strix occidentalis</i>	Research and reports
Alameda whipsnake	<i>Masticophis lateralis euryxanthus</i>	Expert testimony

EXHIBIT C



SMITH ENGINEERING & MANAGEMENT

November 12, 2024

Ms. Tara Rengifo
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Subject: E & P Technology Way – Building A & B ISMND

P24006

Dear Ms. Rengifo:

Per your request, I reviewed the Draft Initial Study Mitigated Negative Declaration (the “ISMND”) for the E & P Technology Way – Building A & B Project (the “Project”) in the County of Napa (the “County”). My review is with respect to transportation and circulation considerations.

My qualifications to perform this review include registration as a Civil and Traffic Engineer in California, over 50 years professional consulting practice in these fields and both preparation and review of the traffic and transportation components of numerous environmental documents prepared under the California Environmental Quality Act (“CEQA”). My professional resume is attached hereto.

My comments follow.

The Transportation Section of the ISMND Evaluates the VMT of the Two Components of the Project Independently of One Another. This Is a Project Segmentation or Piecemealing That Is Improper Under CEQA.

The ISMND at pages 1 and 2 identifies the proposed development as a single project comprised of 2 components, a winery (“Building A”) and a warehouse (“Building B”). Moreover, the air quality and public health analysis in the MND at pages 7-8 estimates “the project is anticipated to generate 218 total weekday trips. However, the Transportation Section, at page 26, does not consider the VMT of the Project as a whole as required by CEQA. Instead, it independently

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evaluates the winery in Building A as having an average of 71 daily trips during non-harvest months and 104 trips per day during harvest months. Based on the trip calculations for Building A alone, the MND states no further VMT analysis is required under the OPR guidance “that, absent substantial evidence otherwise, the addition of 110 or fewer daily trips could be presumed to have a less than significant VMT impact.”

The MND at page 27 determines that the Building B warehouse would generate 114 trips per day, which would exceed the 110 trip threshold, and requires the implementation of a Transportation Demand Management Plan (MM TRANS-1). Segmenting the transportation analysis for Building A from Building B is clear piecemealing and violates CEQA. Building A and Building B, i.e., the Project as a whole, would have an estimated 218 daily trips, which is well more than the 110 daily trip maximum for presumption of a less than significant VMT impact. The Project’s impact on VMT must be analyzed for the whole of the action and since the Project as a whole would exceed the threshold, there would be a significant and unavoidable impact on VMT. Mitigation measure(s) are necessary to reduce these significant impacts on VMT for the Project to less than significant levels.

Omissions in the Project Description

The Project Description lacks information about the number and frequency of clients that will visit Building A. The ISMND states at page 2 that no retail sales or access for the general public is proposed. However, the ISMND does state at page 2 that “Individual clients will visit the site on occasion to hold meetings with members of the wine trade, such as their distributors, restaurants, wine shop owners and similar types of wine buyers.”

The ISMND provides no information about how frequently such gatherings would occur and the numbers of attendees. Due to these omissions in the Project Description, the transportation analysis provides no information about the traffic and VMT associated with such meetings. The Project’s Transportation Impact Study at page 7 explains that the anticipated trip generation for Building A was estimated using the Napa County Winery Trip Generation Worksheet. Appendix C to the study includes this worksheet, which puts zero as the maximum daily visitation during the harvest and non-harvest seasons. Only full-time and part-time employees are considered in the trip generation analysis for Building A even though the MND acknowledges that there will be client meetings at the facility during operations. The Project Description must be revised to include information about how frequently such gatherings would occur and the numbers of attendees and the Project’s VMT analysis must be revised accordingly.

The Trip Generation Estimates for Building B are Unsupported

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For Building B (the warehouse), where a staff of 30 employees is indicated, 82 parking spaces are to be provided. The staff report at page 7 states that 38 of the 82 to be provided are “for the warehouse” and 44 are “for the office”. An estimated 11,000 square feet of office space (the square footage that would typically be needed to support 44 office workers) in Building B is over 16 percent of the building’s floor area and thus the office component is not a small ancillary use to the warehouse.

The office uses in Building B should have been analyzed using *Trip Generation, 11th Edition* Land Use Category 710 “Office” instead of Land Use Category 150 “Warehouse”. That authoritative reference source indicates office use generates 10.84 trips per thousand square feet daily, 1.52 trips per thousand in the AM peak hour and 1.44 trips per thousand in the PM peak hour whereas warehouse use generates only 1.71 trips per thousand square feet daily, 0.19 per thousand in the AM peak and 0.18 trips per thousand in the PM peak. In other words, depending on the time period under consideration, office use generates between 6 and 8 times more traffic than the same square footage of warehouse. Had the analysis considered an office component, both the trip totals and the VMT generation of Building B would be significantly increased. These impacts are undisclosed and unmitigated in the MND.

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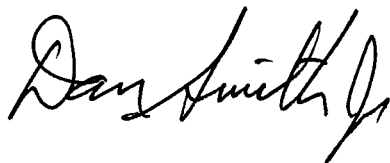
Conclusion

Given the above, the ISMND’s transportation section is inadequate and an EIR must be prepared.

Sincerely,

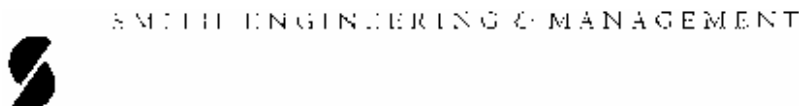
Smith Engineering & Management
A California Corporation

Ms. Tara Rengifo
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Daniel T. Smith Jr., P.E.
President

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Adams Broadwell Joseph & Cardozo
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Page 5



DANIEL T. SMITH, Jr.
President

EDUCATION

Bachelor of Science, Engineering and Applied Science, Yale University, 1967
Master of Science, Transportation Planning, University of California, Berkeley, 1968

PROFESSIONAL REGISTRATION

California No. 21913 (Civil) Nevada No. 7969 (Civil) Washington No. 29337 (Civil)
California No. 938 (Traffic) Arizona No. 22131 (Civil)

PROFESSIONAL EXPERIENCE

Smith Engineering & Management, 1993 to present. President.
DKS Associates, 1979 to 1993. Founder, Vice President, Principal Transportation Engineer.
De Leuw, Cather & Company, 1968 to 1979. Senior Transportation Planner.
Personal specialties and project experience include:

Litigation Consulting. Provides consultation, investigations and expert witness testimony in highway design, transit design and traffic engineering matters including condemnations involving transportation access issues; traffic accidents involving highway design or traffic engineering factors; land use and development matters involving access and transportation impacts; parking and other traffic and transportation matters.

Urban Corridor Studies/Alternatives Analysis. Principal-in-charge for State Route (SR) 102 Feasibility Study, a 35-mile freeway alignment study north of Sacramento. Consultant on I-280 Interstate Transfer Concept Program, San Francisco, an AA/EIS for completion of I-280, demolition of Embarcadero freeway, substitute light rail and commuter rail projects. Principal-in-charge, SR 238 corridor freeway/expressway design/environmental study, Hayward (Calif.) Project manager, Sacramento Northeast Area multi-modal transportation corridor study. Transportation planner for I-80N West Terminal Study, and Harbor Drive Traffic Study, Portland, Oregon. Project manager for design of surface segment of Woodward Corridor LRT, Detroit, Michigan. Directed staff on I-80 National Strategic Corridor Study (Sacramento-San Francisco), US 101-Sonoma freeway operations study, SR 92 freeway operations study, I-880 freeway operations study, SR 152 alignment studies, Sacramento RTD light rail systems study, Tasman Corridor LRT AA/EIS, Fremont-Warm Springs BART extension plan/EIR, SRs 70/99 freeway alternatives study, and Richmond Parkway (SR 93) design study.

Area Transportation Plans. Principal-in charge for transportation element of City of Los Angeles General Plan Framework, shaping nations largest city two decades into 21st century. Project manager for the transportation element of 300-acre Mission Bay development in downtown San Francisco. Mission Bay involves 7 million gsf office/commercial space, 8,500 dwelling units, and community facilities. Transportation features include relocation of commuter rail station; extension of MUNI-Metro LRT; a multi-modal terminal for LRT, commuter rail and local bus; removal of a quarter mile elevated freeway; replacement by new ramps and a boulevard; an internal roadway network overcoming constraints imposed by an internal tidal basin; freeway structures and rail facilities; and concept plans for 20,000 structured parking spaces. Principal-in-charge for circulation plan to accommodate 9 million gsf of office/commercial growth in downtown Bellevue (Wash.). Principal-in-charge for 64 acre, 2 million gsf multi-use complex for FMC adjacent to San Jose International Airport. Project manager for transportation element of Sacramento Capitol Area Plan for the state governmental complex, and for Downtown Sacramento Riverfront Redevelopment Plan, on parking program for downtown Walnut Creek, on downtown transportation plan for San Mateo and redevelopment plan for downtown Mountain View (Calif.), for traffic circulation and safety plans for California cities of Davis, Pleasant Hill and Hayward, and for Salem, Oregon.

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Ms. Tara Rengifo
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November 12, 2024
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Transportation Centers. Project manager for Daly City Intermodal Study which developed a \$7 million surface bus terminal, traffic access, parking and pedestrian circulation improvements at the Daly City BART station plus development of functional plans for a new BART station at Colma. Project manager for design of multi-modal terminal (commuter rail, light rail, bus) at Mission Bay, San Francisco. In Santa Clarita Long Range Transit Development Program, responsible for plan to relocate system's existing timed-transfer hub and development of three satellite transfer hubs. Performed airport ground transportation system evaluations for San Francisco International, Oakland International, Sea-Tac International, Oakland International, Los Angeles International, and San Diego Lindberg.

Campus Transportation. Campus transportation planning assignments for UC Davis, UC Berkeley, UC Santa Cruz and UC San Francisco Medical Center campuses; San Francisco State University; University of San Francisco; and the University of Alaska and others. Also developed master plans for institutional campuses including medical centers, headquarters complexes and research & development facilities.

Special Event Facilities. Evaluations and design studies for football/baseball stadiums, indoor sports arenas, horse and motor racing facilities, theme parks, fairgrounds and convention centers, ski complexes and destination resorts throughout western United States.

Parking. Parking programs and facilities for large area plans and individual sites including downtowns, special event facilities, university and institutional campuses and other large site developments; numerous parking feasibility and operations studies for parking structures and surface facilities; also, resident preferential parking .

Transportation System Management & Traffic Restraint. Project manager on FHWA program to develop techniques and guidelines for neighborhood street traffic limitation. Project manager for Berkeley, (Calif.), Neighborhood Traffic Study, pioneered application of traffic restraint techniques in the U.S. Developed residential traffic plans for Menlo Park, Santa Monica, Santa Cruz, Mill Valley, Oakland, Palo Alto, Piedmont, San Mateo County, Pasadena, Santa Ana and others. Participated in development of photo/radar speed enforcement device and experimented with speed humps. Co-author of Institute of Transportation Engineers reference publication on neighborhood traffic control.

Bicycle Facilities. Project manager to develop an FHWA manual for bicycle facility design and planning, on bikeway plans for Del Mar, (Calif.), the UC Davis and the City of Davis. Consultant to bikeway plans for Eugene, Oregon, Washington, D.C., Buffalo, New York, and Skokie, Illinois. Consultant to U.S. Bureau of Reclamation for development of hydraulically efficient, bicycle safe drainage inlets. Consultant on FHWA research on effective retrofits of undercrossing and overcrossing structures for bicyclists, pedestrians, and handicapped.

MEMBERSHIPS

Institute of Transportation Engineers Transportation Research Board

PUBLICATIONS AND AWARDS

Residential Street Design and Traffic Control, with W. Homburger *et al.* Prentice Hall, 1989.

Co-recipient, Progressive Architecture Citation, *Mission Bay Master Plan*, with I.M. Pei WRT Associated, 1984.

Residential Traffic Management, State of the Art Report, U.S. Department of Transportation, 1979.

Improving The Residential Street Environment, with Donald Appleyard *et al.*, U.S. Department of Transportation, 1979.

Strategic Concepts in Residential Neighborhood Traffic Control, International Symposium on Traffic Control Systems, Berkeley, California, 1979.

Planning and Design of Bicycle Facilities: Pitfalls and New Directions, Transportation Research Board, Research Record 570, 1976.

Co-recipient, Progressive Architecture Award, *Livable Urban Streets, San Francisco Bay Area and London*, with Donald Appleyard, 1979.