Final
Environmental Impact Report

SCH# 2023100467

Volume 3

Chapters 7–Response to Comments

WESTSIDE INDUSTRIAL PROJECT

by Seefried Industrial Properties

(PP24402)

General Plan Amendment No. 21, Map No. 142
Zone Classification Change No. 69, Map No. 142
Conditional Use Permit No. 75, Map No. 142
Conditional Use Permit No. 78, Map No. 142
Precise Development Plan No. 3, Map No. 142
Agricultural Preserve No. 10 - Exclusion
Vesting Tentative Parcel Map No. 12537

Kern County
Planning and Natural Resources Department
Bakersfield, CA

April 2024

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PLANNING AND NATURAL RESOURCES DEPARTMENT

Planning
Community Development
Administrative Operations

April 25, 2024

FILE: GPA No. 21; ZCC No. 69; CUP No. 75; CUP No. 78; PD Plan No. 3; Ag Pres 10 Excl, Map No. 142; VTPM 12537
S.D.: #4 - Couch

Addressee List (See Distribution List)

Re: Response to Comments for Draft Environmental Impact Report–Westside Industrial Project by Seefried Industrial Properties (PP24402) (SCH#2023100467)

Dear Interested Party:

Enclosed is a document entitled *Volume 3–Chapter 7–Response to Comments*, for the above referenced project. Section 15088 of the California Environmental Quality Act Guidelines requires the Lead Agency to evaluate comments on environmental issues received from persons who reviewed the Draft Environmental Impact Report (EIR) and prepare a written response addressing each comment. This document is Chapter 7 of the Final EIR.

A public hearing has been scheduled with the Kern County Planning Commission to consider this request on **May 9, 2024** at 7:00 p.m., or soon thereafter, at the Chambers of the Board of Supervisors, First Floor, Kern County Administrative Center, 1115 Truxtun Avenue, Bakersfield, California.

Thank you for your participation in the environmental process for this project. If you have any questions regarding this project, please do not hesitate to contact me at (661) 862-5041 or via email at TolentinoM@kerncounty.com.

Sincerely,

Mark Tolentino, Planner II
Planning and Natural Resources Department

COMMENTING AGENCIES AND INTERESTED PERSONS: California Department of Transportation (Caltrans); Kern County Superintendent of Schools; Santa Rosa Rancheria Tachi Yokut Tribe; Kern County Fire Department; John Borba; California Department of Fish and Wildlife; Golden State Environmental Justice Alliance; Advocates for the Environment; San Joaquin Valley Air Pollution Control District

Westside Industrial – RTC List

California Department of Transportation
District 6
1352 W. Olive
Fresno, CA 93728

Kern County Superintendent of Schools
1300 17th Street, City Centre
Bakersfield, CA 93301

Santa Rosa Rancheria Tachi Yokut Tribe 16835 Alkali Dr Suite M,
Lemoore, CA 93245

Kern County Fire Department
2820 M St
Bakersfield, CA 93301

John Borba
13500 South H Street
Bakersfield, CA

California Fish & Wildlife
1234 East Shaw Avenue
Fresno, CA 93710

Golden State Environmental Justice
Alliance
P.O. Box 79222
Corona, CA 92877

Advocates for the Environment
10211 Sunland Blvd.
Shadow Hills, CA 91040

San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg Avenue
Fresno, CA 93726

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2023100467

Project Title: Westside Industrial Project by Seefried Industrial Properties

Lead Agency: Kern County Planning and Natural Resources Department | Contact Person: Mark Tolentino

Mailing Address: 2700 "M" Street Suite 100 | Phone: (661) 862-5041

City: Bakersfield | Zip: 93301 | County: Kern

Project Location: County: Kern | City/Nearest Community: City of Bakersfield

Cross Streets: Houghton Road & Wible Road | Zip Code: 93313

Lat. / Long.: 35° 14.19042' N, 119° 2.27736' W | Total Acres: 93.74

Assessor's Parcel No.: 184-391-08 | Section: 13 | Twp.: 31 S | Range: 27 E | Base: MDB&M

Within 2 Miles: State Hwy #: 99 | Waterways: N/A

Airports: N/A | Railways: N/A | Schools: Gen. Shafter Elementary

Document Type:

CEQA: ☐ NOP ☐ Early Cons ☐ Neg Dec ☐ Mit Neg Dec ☐ Draft EIR ☐ Supplement/Subsequent EIR (Prior SCH No.) ☐ Other Response to Comments/FEIR

NEPA: ☐ NOI ☐ EA ☐ Draft EIS ☐ FONSI

Other: ☐ Joint Document ☐ Final Document ☐ Other

Local Action Type:

☐ General Plan Update ☒ General Plan Amendment ☐ General Plan Element ☐ Community Plan
☐ Specific Plan ☐ Master Plan ☐ Planned Unit Development ☐ Site Plan
☒ Rezone ☐ Prezone ☒ Use Permit ☒ Land Division (Subdivision, etc.)
☐ Annexation ☐ Redevelopment ☐ Coastal Permit ☒ Other: PD Plan, Ag Preserve Excl.

Development Type:

☐ Residential: Units ____ Acres ____
☐ Office: Sq.ft. ____ Acres ____ Employees ____
☐ Commercial: Sq.ft. ____ Acres ____ Employees ____
☒ Industrial: Sq.ft. 653,442 Acres 93.74 Employees 1,830
☐ Educational ____
☐ Recreational ____

☐ Water Facilities: Type ____ MGD ____
☐ Transportation: Type ____
☐ Mining: Mineral ____
☐ Power: Type ____ MW ____
☐ Waste Treatment: Type ____ MGD ____
☐ Hazardous Waste: Type ____
☐ Other: ____

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☒ Agricultural Land ☒ Air Quality ☒ Archeological/Historical ☒ Biological Resources ☐ Coastal Zone ☒ Drainage/Absorption ☒ Economic/Jobs
☒ Fiscal ☒ Flood Plain/Flooding ☒ Forest Land/Fire Hazard ☒ Geologic/Seismic ☒ Minerals ☒ Noise ☒ Population/Housing Balance ☒ Public Services/Facilities
☒ Recreation/Parks ☒ Schools/Universities ☒ Septic Systems ☒ Sewer Capacity ☒ Soil Erosion/Compaction/Grading ☒ Solid Waste ☒ Toxic/Hazardous ☒ Traffic/Circulation
☒ Vegetation ☒ Water Quality ☒ Water Supply/Groundwater ☒ Wetland/Riparian ☒ Wildlife ☒ Growth Inducing ☒ Land Use ☒ Cumulative Effects
☒ Other GHG, Wildfire, Tribal Cultural Resources, Energy

Present Land Use/Zoning/General Plan Designation:

Agricultural Land/*Zoning:* A (Exclusive Agriculture)/*General Plan:* R-IA (Intensive Agriculture)

Project Description: The Westside Industrial Project is a proposal by Seefried Industrial Properties for the construction and operation of a warehouse and distribution facility. The proposed project would include the construction of an approximately 653,442-square-foot single-story warehouse and related site improvements, including but not limited to, perimeter security fencing and nighttime directional lighting at the on-site warehouse and distribution facility, new pavement, curb and gutter, and sidewalk on frontage roads with associated signing and markings, office, break and ancillary space. The proposed project located on an approximately 93.74-acre portion of an approximately 630 total-acre parcel, and is bounded by Wible Road (west), Houghton Road (north), and agricultural land (south and east). The project site is approximately 1.3 miles south of the City of Bakersfield, in unincorporated Kern County. Regionally, the project site is located within the Kern County, Metropolitan Bakersfield General Plan (unincorporated Planning Area) within the City of Bakersfield Sphere of Influence (SOI).

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "**X**".
If you have already sent your document to the agency please denote that with an "**S**".

_____	Air Resources Board	_____	Office of Emergency Services
_____	Boating & Waterways, Department of	_____	Office of Historic Preservation
_____	California Highway Patrol	_____	Office of Public School Construction
_____	CalFire	_____	Parks & Recreation
S	Caltrans District # 6	_____	Pesticide Regulation, Department of
_____	Caltrans Division of Aeronautics	_____	Public Utilities Commission
_____	Caltrans Planning (Headquarters)	_____	Regional WQCB # Central Valley
_____	Central Valley Flood Protection Board	_____	Resources Agency
_____	Coachella Valley Mountains Conservancy	_____	S.F. Bay Conservation & Development Commission
_____	Coastal Commission	_____	San Gabriel & Lower L.A. Rivers and Mtns Conservancy
_____	Colorado River Board	_____	San Joaquin River Conservancy
_____	Conservation, Department of	_____	Santa Monica Mountains Conservancy
_____	Corrections, Department of	_____	State Lands Commission
_____	Delta Protection Commission	_____	SWRCB: Clean Water Grants
_____	Education, Department of	_____	SWRCB: Water Quality
_____	Energy Commission	_____	SWRCB: Water Rights
S	Fish & Game Region # Fresno	_____	Tahoe Regional Planning Agency
_____	Food & Agriculture, Department of	_____	Toxic Substances Control, Department of
_____	General Services, Department of	_____	Water Resources, Department of
_____	Health Services, Department of		
_____	Housing & Community Development	_____	Other _____
_____	Integrated Waste Management Board	_____	Other _____
_____	Native American Heritage Commission		

Local Public Review Period (to be filled in by lead agency)

Starting Date April 25, 2024 Ending Date May 9, 2024

Lead Agency (Complete if applicable):

Consulting Firm: _____
Address: _____
City/State/Zip: _____
Contact: _____
Phone: _____

Applicant: _____
Address: _____
City/State/Zip: _____
Phone _____

Signature of Lead Agency Representative: _____/s/_____ **Date:** 04/25/2024

Mark Tolentino, Planner II

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

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Kern County
Planning and Natural Resources Department
Bakersfield, CA

April 2024

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7.1 Introduction

Purpose

As defined by Section 15050 of the California Environmental Quality Act (CEQA) Guidelines, the Kern County Planning and Natural Resources Department is serving as "Lead Agency" for the preparation of the Environmental Impact Report (EIR) for the Westside Industrial Project (project or proposed project). The Final EIR presents the environmental information and analyses that have been prepared for the project, including comments received addressing the adequacy of the Draft EIR, and responses to those comments. In addition to the responses to comments, clarifications, corrections, or minor revisions have been made to the Draft EIR. The Final EIR which includes the responses to comments, the Draft EIR, and the Mitigation, Monitoring, and Reporting Program, will be used by the Planning Commission and the Board of Supervisors in the decision-making process for the proposed project.

Environmental Review Process

A Notice of Preparation (NOP)/Initial Study (IS) (SCH No. 2023100467) was circulated for a 30-day public review period beginning on October 17, 2023, and ending on November 16, 2023. Thirteen (13) individual written comment letters were received on the NOP during this review period. Three comments were received at the November 8, 2023, public scoping meeting. All public comments received relevant to CEQA-related issues were considered by the County in preparing the Draft EIR.

The Draft EIR for the proposed project was circulated for a 45-day public review period beginning on February 20, 2024 through April 5, 2024. A total of ten (10) comment letters were received on the Draft EIR, two of which were received after the review period had ended.

Section 15088 of the *CEQA Guidelines* requires that the lead agency evaluate comments on environmental issues received from persons and agencies that reviewed the Draft EIR and prepare a written response addressing the comments received. The response to comments is contained in this document -Volume 3, Chapter 7 of the Draft EIR. Volumes 1, 2, and 3 together constitute the Final EIR.

7.2 Revisions to the Draft EIR

The revisions that follow were made to the text of the Draft EIR. Amended text is identified by page number. Additions to the Draft EIR text are shown with <u>underlined</u> text, and text removed from the Draft EIR is shown with ~~strikethrough~~. Revisions to a Draft EIR are required if clarifications or responses to comments cannot be made without alterations to the document. The revisions, as outlined below, fall within the scope of the original project analysis included in the Draft EIR and do not result in an increase to any identified impacts or produce any new impacts. No new significant environmental impact would result from the changes or from a new mitigation measure proposed to be implemented. Therefore, no significant revisions have been made which would require recirculation of the Draft EIR pursuant to *CEQA Guidelines* Section 15088.5 (Recirculation of an EIR Prior to Certification).

Global Revisions

The following "global changes" are intended to apply to the Draft EIR in all instances where such text or figures shown below appears within the document. The text and figure revisions are not repeated herein for each occurrence within the Draft EIR in order to streamline this document.

- ~~Zone Variance to authorize a 9.63-acre (gross) parcel where 20 acres (gross) is required (Section 19.12.050) in the A (Exclusive Agriculture) District (ZV No. 67, Map 142).~~
- Vesting Tentative Parcel Map No. 12537 proposing the division of a 642.68-acre parcel into a 9.63-acre (gross) parcel, a 97.70-acre (gross) parcel and a 535.35-acre (gross) Designated Remainder which may be processed concurrently with, or subsequent to, other project entitlements.

Cumulative Setting Impacts and Mitigation Measures

As shown in **Chapter 3**, *Project Description*, **Table 3-5**, *Cumulative Project List*, there are ~~14~~ 13 proposed projects within a 1-mile radius of the project site.

Chapter 1.0, Executive Summary, Table 1-6, Page 1-15

TABLE 1-6: SUMMARY OF SIGNIFICANT AND UNAVOIDABLE PROJECT-LEVEL AND CUMULATIVE IMPACTS OF THE PROPOSED PROJECT

Resources	Project Impacts	Cumulative Impacts
Aesthetics	Implementation of the proposed project would result in potentially significant visual impacts to the existing visual quality or character of the site and surrounding area, as outlined in **Section 4.1**, *Aesthetics*, **Impact 4.1-3**. **Mitigation Measure MM 4.1-1** through **MM 4.1-3** would be incorporated to reduce visual impacts that would occur from the collection of debris along the site boundary and would limit vegetation removal and plant native vegetation. However, because there are no feasible mitigation measures that can be implemented to maintain the existing open and undeveloped landscape character of the project site, impacts to visual resources would remain **significant and unavoidable**.	The proposed project would have cumulatively significant and unavoidable aesthetic impacts related to visual character despite implementation of mitigation. Although implementation of **Mitigation Measures MM 4.1-1** through **MM 4.1-5** would reduce the adverse visual changes experienced at individual viewpoints, there are no mitigation measures that would allow for the preservation of the existing visual character of the area. The conversion of approximately 93.74 acres of undeveloped land to a ~~solar energy production~~ warehouse facility is considered a **significant and unavoidable** cumulative impact.

Chapter 1.0, Executive Summary, Table 1-9, Page 1-27

TABLE 1-9: SUMMARY OF DEVELOPMENT ALTERNATIVES

Alternative	Description	Basis for Selection and Summary of Analysis
Alternative 3: Alternative Site Alternative	Construction and operation of the warehouse and associated development on an alternative site located approximately 50 miles southeast of the proposed project site. Required entitlements for the Alternative Site Alternative would be dependent on the site selected.	• Similar impacts to ~~aesthetics, agriculture and forestry resources,~~ air quality, energy, GHG emissions, public services, recreation. • Greater impacts to all other issue areas. • No issue areas with less impact.

Chapter 1.0, Executive Summary, Table 1-9, Page 1-27

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
4.1 Aesthetics			
Impact 4.1-3: The project would, in nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.	Potentially significant	**MM 4.1-1:** Prior to the issuance of ~~s~~ a building permit for the proposed project, the project applicant shall submit a proposed color scheme and treatment plan, for review and approval by the Kern County Planning and Natural Resources Department, that will ensure all project facilities blend in with the colors found in the surrounding landscape. All color treatments shall result in matte or nonglossy finishes.	~~Less than significant impact.~~ Significant and unavoidable impact

Chapter 1.0, Executive Summary, Table 1-9, Page 1-31

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
4.2 Agriculture and Forestry Resources			
Impact 4.2-5: The project would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use.	Potentially significant impact	Implementation of **Mitigation Measures MM 4.2-1** through **MM 4.2-4**, **MM 4.9-1** through **MM 4.9-3** would be required (see Section 4.9, *Hazards and Hazardous Materials*, for full mitigation measure text).	~~Less than significant impact.~~ Significant and unavoidable impact

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
4.3 Air Quality			
Impact 4.3-1: Implementation of the proposed project would conflict with or obstruct implementation of the applicable air quality plan.	Potentially significant	**MM 4.3-3:** ~~The proposed project shall continuously comply with the following:~~ The project proponent and/or its contractors shall implement the following measures during construction of the project: a. All equipment shall be maintained in accordance with the manufacturer's specifications. b. Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for extended periods of time. c. Construction equipment shall <u>not</u> operate longer than eight cumulative hours per day <u>without prior written authorization provided by the Kern County Planning and Natural Resources Department</u>. d. Electric equipment shall be used whenever possible in lieu of diesel- or gasoline-powered equipment. e. All construction vehicles shall be equipped with proper emissions control equipment and kept in good and proper running order to substantially reduce NO_X emissions. f. On-road and off-road diesel equipment shall use diesel particulate filters (or the equivalent) if permitted under manufacturer's guidelines. g. Tier 3 engines shall be used on all equipment when available. **MM 4.3-5:** Prior to issuance of any grading or construction permits the Owner/Operator shall enter into an Developer Mitigation Agreement (DMA) with the San Joaquin Valley Air Pollution Control District. The DMA is to <u>fully</u> mitigate <u>construction and operations</u> criteria emissions of the warehouse project implementation~~, not required to be offset under a District rule ,~~ and for Project vehicle and all other mobile source emissions. The Owner/operator shall pay fees to fully ~~offset~~ <u>mitigate</u> Project emissions of NOx (oxides of nitrogen), ROG (reactive organic gases), PM_{10} (particulate matter of 10 microns or less in diameter), and $PM_{2.5}$ (particulate matter of 2.5 microns or less in diameter) (~~including as applicable mitigating for reactive organic gases by additive reductions of particulate matter of 10 microns or less in diameter)~~ (collectively, "designated criteria emissions") to avoid any net increase in these	Significant and unavoidable

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		pollutants. The air quality mitigation fee shall further be paid prior to the approval of any construction or grading approval ~~and shall be used to reduce designated criteria emissions to fully offset Project emissions that are not otherwise required to be fully offset by District permit rules and regulations~~.	

Chapter 1.0, *Executive Summary*, Table 1-9, Page 1-44 through 1-45

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
4.4 Biological Resources			
Impact 4.4-1: The project would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or a special-status species in local or regional plans, policies, or regulations or by California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	Potentially significant impact	**MM 4.4-4** If construction activities are conducted during the typical nesting bird season (February 15 through September 15), pre-construction surveys shall be conducted by a qualified Biologist prior to any site preparation and/or construction activity to identify potential nesting bird activity. The survey area shall include a 500-foot buffer surrounding the property. <u>Swainson's hawk protocol-level surveys shall be consistent with the survey methods developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC 2000)</u>; If no active nests are found within the survey area, no further mitigation is required. If nesting activity is identified during the pre-construction survey process, the following measures will be implemented: a. If active nest sites of bird species protected under the Migratory Bird Treaty Act and/or California Fish and Game Code are observed within the project site, then the project will be modified and/or delayed as necessary to avoid direct take of the identified nests, eggs, and/or young.	Less than significant impact

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		b. If active nest sites of raptors and/or bird species of special concern are observed within the vicinity of the project site, then the appropriate buffer around the nest site (typically 250 feet for passerines and 500 feet for raptors) shall be established. Construction activities in the buffer zone shall be prohibited until the young have fledged the nest and achieved independence. c. Active nests shall be documented by a qualified Biologist, and a letter report shall be submitted to the Kern County Planning and Natural Resources Department documenting project compliance with the MBTA and California Fish and Game Code.	
		MM 4.4-9 Pre-construction protocol-level surveys by a qualified Biologist for nesting birds shall be required if construction activities are scheduled to occur during the breeding season for raptors and other migratory birds (February 1– August 31), to reduce potential impacts to nesting birds and raptors. The survey shall be conducted within 30 days of ground disturbance activities. ~~a.~~ If any nesting birds/raptors are observed, a qualified Biologist shall determine buffer distances and/or the timing of project activities so that the proposed project does not cause nest abandonment or destruction of eggs or young. This measure shall be implemented so that the proposed project remains in compliance with the Migratory Bird Treaty Act (MBTA) and applicable State regulations.	

Chapter 1.0, *Executive Summary*, Table 1-9, Page 1-51

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
4.4 Biological Resources			
Impact 4.4-4: The project could interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	Potentially significant impact	Implementation of **Mitigation Measures MM 4.4-43** ~~and **MM 4.4-10**~~ through **4.4-11**.	Less than significant impact

Chapter 1.0, *Executive Summary*, Table 1-9, Page 1-63 through 1-64

Impact	Level of Significance before Mitigation		Mitigation Measure(s)	Level of Significance After Mitigation
4.8 Greenhouse Gas Emissions				
Impact 4.8-1: The project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Potentially significant	**MM 4.8-1**	a. Prior to issuance of occupancy permits, the project developer shall disclose to all tenants/business entities that only electric-powered off-road equipment (e.g., forklifts, indoor material handling equipment, etc.) shall be utilized on-site for daily warehouse and business operations. The limitation on using only electric-powered off-road equipment shall be included in all leasing agreements. b. Prior to issuance of grading or building permits, the project construction's General Contractor shall target construction waste diversion rate of 80 percent. A monthly construction report shall be provided to the County documenting total waste generated, types of waste streams and total recycled.	Less than significant impact

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		c. During operation and to the extent feasible for safe warehouse operations, automatic light switches shall be incorporated into the project. d. During operation, any equipment containing greater than five pounds of refrigerant, procured or installed shall be tagged so that project applicant and tenant can identify and verify all installed equipment.	

Chapter 1.0, *Executive Summary*, Table 1-9, Page 1-65

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
4.9 Hazards and Hazardous Materials			
Impact 4.9-1: The project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Potentially significant	**MM 4.9-3:** During the life of the project, ~~including decommissioning,~~ the project operator shall prepare and maintain a Hazardous Materials Business Plan, as applicable, pursuant to Article 1 and Article 2 of California Health and Safety Code 6.95 and in accordance with Kern County Ordinance Code 8.04.030, by submitting all the required information to the California Environmental Reporting System at http://cers.calepa.ca.gov/ for review and acceptance by the Kern County Environmental Health Services Department/Hazardous Materials Section. The Hazardous Materials Business Plan shall: a. Delineate hazardous material and hazardous waste storage areas b. Describe proper handling, storage, transport, and disposal techniques c. Describe methods to be used to avoid spills and minimize impacts in the event of a spill d. Describe procedures for handling and disposing of unanticipated hazardous materials encountered during construction and operation e. Establish public and agency notification procedures for spills and other emergencies including fires	Less than significant impact

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		f. Include procedures to avoid or minimize dust from existing residual pesticides and herbicides that may be present on the site The project proponent shall ensure that all contractors working on the project are familiar with the facility's Hazardous Materials Business Plan as well as ensure that one copy is available at the project site at all times. In addition, a copy of the accepted Hazardous Materials Business Plan from California Environmental Reporting System shall be submitted to the Kern County Planning and Natural Resources Department for inclusion in the projects permanent record.	

Chapter 1.0, *Executive Summary*, Table 1-9, Page 1-67

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
4.9 Hazards and Hazardous Materials			
Impact 4.9-2: The project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	Potentially significant	**MM 4.9-6** Prior to start of construction, the abandoned petroleum prospect well shall be located, exposed, and re-abandoned, if required, to conform to the current abandonment requirements of the California Department of Conservation, ~~Division of Oil, Gas and Geothermal Resources~~ Geologic Energy Management Division (CalGEM) and the Kern County Department of Environmental Health Services.	Less than significant impact

Chapter 1.0, *Executive Summary*, Table 1-9, Page 1-70 through 1-71

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
4.9 Hazards and Hazardous Materials			
Impact 4.9-8: The project would generate vectors (flies, mosquitoes, rodents, etc.) or have a component that includes agricultural waste. Specifically, the project would not exceed the following qualitative threshold: the presence of domestic flies, mosquitoes, cockroaches, rodents, and/or any other vectors associated with the project is significant when the applicable enforcement agency determines that any of the vectors: i. Occur as immature stages and adults in numbers considerably in excess of those found in the surrounding environment; or ii. ii. Are associated with design, layout, and management of project operations; or iii. Disseminate widely from the property; or iv. Cause detrimental effects on the public health or well-being of the majority of the surrounding population.	Potentially Significant Impact	**MM 4.9-14:** Prior to issuance of a grading or building permit, a Maintenance, Trash Abatement, and Pest Management Program shall be submitted for review and approval to the Kern County Planning and Natural Resources Department. The program shall include, but not be limited to the following: a. The project applicant shall clear debris from the project area at least four times per year; this can be done in conjunction with regular ~~panel washing and~~ site maintenance activities. b. The project applicant shall erect signs with contact information for the project proponent/operator's maintenance staff at regular intervals along the site boundary, as required by the Kern County Planning and Natural Resources Department. Maintenance staff shall respond within two weeks to resident requests for additional cleanup of debris. Correspondence with such requests and responses shall be submitted to the Kern County Planning and Natural Resources Department. c. The project applicant shall implement a regular trash removal and recycling program on an ongoing basis during construction and operation of the project. Barriers to prevent pest/rodent access to food waste receptacles shall be implemented. Locations of all trash receptacles during operation of the project shall be shown on final plans. d. Trash and food items shall be contained in closed containers to be locked at the end of the day and removed at least once per week to reduce the attractiveness to opportunistic predators such as common ravens, coyotes, and feral dogs.	Less than significant impact

Chapter 1.0, *Executive Summary*, Table 1-9, Page 1-72

Impact	Level of Significance before Mitigation	Mitigation Measure(s)		Level of Significance After Mitigation
4.10 Hydrology and Water Quality				
Impact 4.3-1: Implementation of the proposed project would conflict with or obstruct implementation of the applicable air quality plan.	Potentially significant	**MM 4.10-1:**	Prior to issuance of a grading permit, the project proponent/operator shall submit a Stormwater Pollution Prevention Plan for review and approval by the Kern County Planning and Natural Resources Department and/or Kern County Public Works Department. The Stormwater Pollution Prevention Plan shall be designed to minimize runoff and shall specify Best Management Practices to prevent all construction pollutants from contacting stormwater, with the intent of keeping sediment or any other pollutants from moving off-site and into receiving waters. The requirements of the Stormwater Pollution Prevention Plan shall be incorporated into design specifications and construction contracts. Recommended best management practices to be incorporated in the Stormwater Pollution Prevention Plan shall include the following: a. Minimization of vegetation removal; b. Implementing sediment controls, including silt fences as necessary; c. Installation of a stabilized construction entrance/exit and stabilization of disturbed areas; d. Properly containing and disposing of hazardous materials used for construction on-site. e. Properly covering stockpiled soils to prevent wind erosion; f. Proper protections and containment for fueling and maintenance of equipment and vehicles~~; and~~.	Significant and unavoidable

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		g. Appropriate disposal of demolition debris, concrete and soil, and aggressively controlling litter. h. Cleanup of silt and mud on adjacent street due to construction activity. i. Checking all lined and unlined ditches after each rainfall. j. Restore all erosion control devices to working order to the satisfaction of the Kern County Planning and Natural Resources Department and/or Kern County Public Works Department after each rainfall run-off. k. Install additional erosion control measures as may be required due to uncompleted grading operations or unforeseen circumstances which may arise.	

Chapter 1.0, *Executive Summary*, Table 1-9, Page 1-76 through 1-77

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
4.13 Noise			
Impact 4.13-1: The project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Potentially significant	**MM 4.13-1:** The following measures are required to reduce short- term noise levels associated with project construction: ~~1~~a. Construction activities at the project site shall comply with the hourly restrictions for noise-generating construction activities, as specified in the Kern County Noise Ordinance (Municipal Ordinance Code 8.36.020). Accordingly, construction activities shall be prohibited between the hours of 9:00 p.m. to 6:00 a.m. on weekdays, and between 9:00 p.m. to 8:00 a.m. on weekends. These hourly limitations shall not apply to activities where hourly limitations would result in increased safety risk to workers or the public.	Less than significant impact

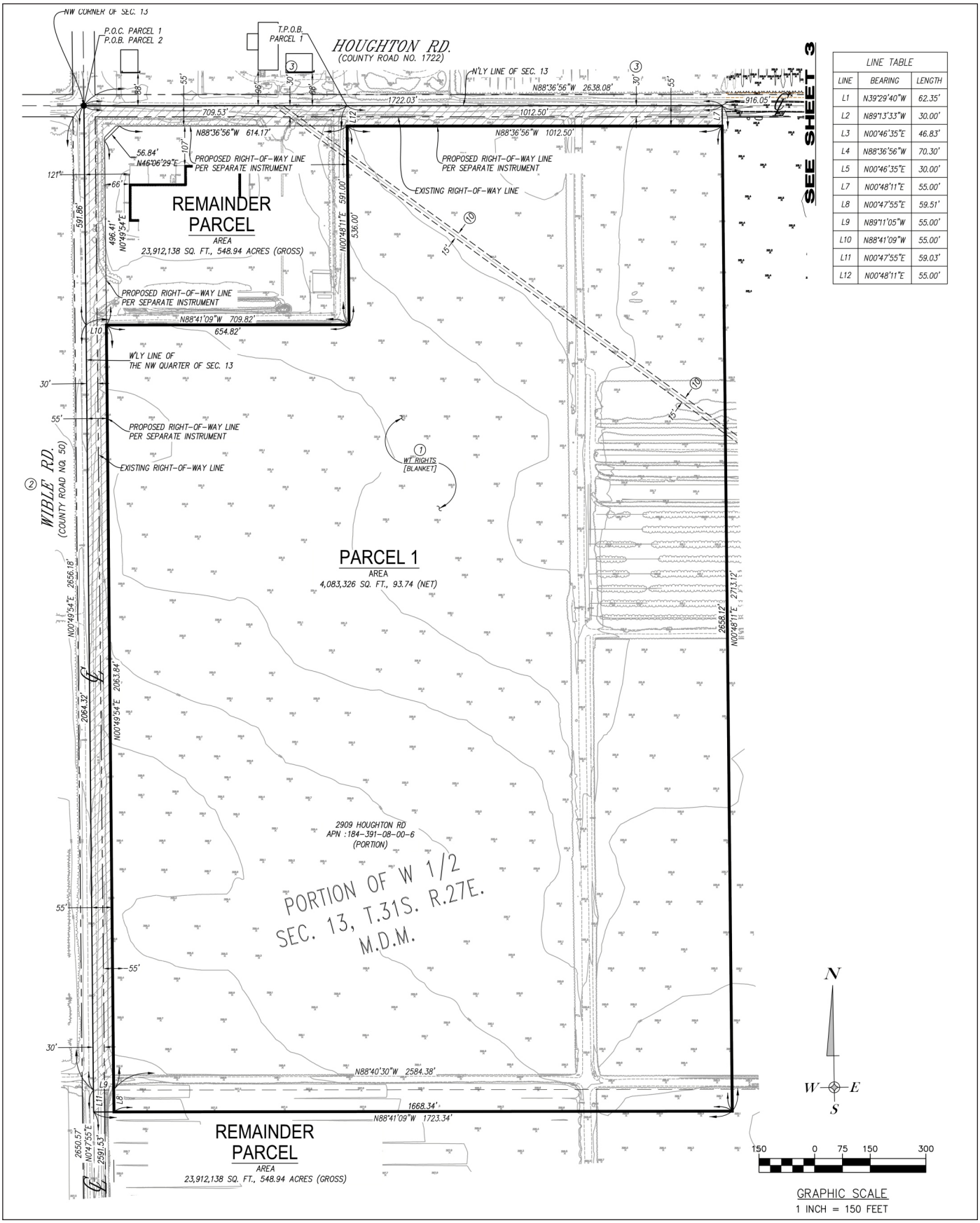
Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		~~2~~b. Equipment staging and laydown areas shall be located at the farthest practical distance from nearby residential land uses. To the extent possible, staging and laydown areas should be located at least 500 feet of existing residential dwellings. ~~3~~c. Where feasible construction equipment shall be fitted with approved noise- reduction features such as mufflers, baffles and engine shrouds that are no less effective than those originally installed by the manufacturer. 4d. Haul trucks shall not be allowed to idle for periods greater than five minutes, except as needed to perform a specified function (e.g., concrete mixing). ~~5~~e. On-site vehicle speeds shall be limited to 15 miles per hour, or less (except in cases of emergency). ~~6~~f. Backup beepers for all construction equipment and vehicles shall be broadband sound alarms or adjusted to the lowest noise levels possible, provided that the Occupational Safety and Health Administration and California Division of Occupational Safety and Health's safety requirements are not violated. On vehicles where backup beepers are not available, alternative safety measures such as escorts and spotters shall be employed. **MM 4.13-2:** Prior to the issuance of grading permits, a "Noise Disturbance Coordinator" shall be established. The project operator shall submit evidence of methods of implementation and shall continuously comply with the following during construction: ~~1~~a. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. b. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved.	

Chapter 1.0, *Executive Summary*, Table 1-9, Page 1-85 through 1-86

Impact	Level of Significance before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
4.19 Utilities and Service Systems			
Impact 4.19-1: The project would require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	Less than significant impact	**MM 4.19-2:** Proposals and plans for package treatment and disposal facilities shall be subject to the review and approval of: ~~1~~a. The State and County Environmental Health Services Departments for design and contamination aspects; ~~2~~b. The Regional Water Quality Control Board for elements of pollution and nuisance; and ~~3~~c. The Kern County Public Works Department for structural and mechanical integrity. Special structures, such as pump stations, pressure lines and sags, etc. shall be subject to the approval of the Kern County Public Works Department and the maintaining District.	Less than significant impact

Chapter 3.0, *Project Description*, Page 3-19

Figure 3-3h: Vesting Tentative Parcel Map



Source: PBLA Surveying, Inc.

Figure 3-3h
Vesting Tentative Parcel Map

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Chapter 3.0, *Project Description,* Table 3-5, *Cumulative Projects List,* Page 3-49

Project Name/ CASE ID	Project Location	Case Type	Request	Project Site APN	Acreage
			KERN COUNTY PROJECTS		
One Mile Project List					
1.	West side of Costajo Road between Shafter Road and Bear Mountain Boulevard	Precise Development Plan	Precise Development Plan, Map 143, (APN 185-321-20) to allow an industrial development.	185-321-20	
2.		Temporary CUP	Temporary CUP for an agricultural trucking facility.	184-150-423	20.02
3.			EIR: Commercial;– Development of an industrial park-warehouse, distribution and retail showrooms.	185-140-084	306.92
4.	14201 Costajo Street Bakersfield, CA		General Plan Amendment and zone change to allow a tire shop. The application did not contain what the proposed land use designation or zoning district.	185-382-421	2.43
5.	13338 South H Street Bakersfield, CA	CUP	CUP, Map 143-18 for Ag truck parking.	185-381-399	2.01
6.		CUP	Map 142, CUP 65, Modification–Ag Trucking Facility.	184-230-01	
7.		CUP	Map 142, CUP 65, Mod–Ag Trucking Facility.	184-230-01	
8.		GPA, ZCC	Map 143-19, GPA and ZCC–Commercial Development.	185-321-28	
9.	15451 Costajo Road Bakersfield, CA	PD	Map 143-19, PD–Truck Parking Garage.	185-321-19	
10.		CUP	CUP to allow an event venue facility to be used for weddings, baptisms, birthdays, and quinceneras on an A-1 zone and RR general plan land use code on 4.94 acres.	185-382-44	
11.		CUP	Map 143-18, CUP–Ag Trucking Facility.	185-210-03	
12.			To develop a trucking facility in an M-1 PD Zone District.	185-321-20	

Project Name/ CASE ID	Project Location	Case Type	Request	Project Site APN	Acreage
13.		GPA, ZCC	Map 143-19, GPA, ZCC– Request GPA ZCC from RIA- to LI and A-1 to M-1 to allow for a tire distribution shop on 1.56 acres.	185-322-120	1.54
~~14.~~	~~2909 Houghton Road Bakersfield, CA~~	~~GPA, ZCC, PD~~	~~GPA ZCC PD for Warehousing.~~	~~184-391-084~~	~~629.08~~

Notes:
CUP = Conditional Use Permit
GPA = General Plan Amendment
LMR = Low Medium Density Residential
PD = Precise Development
ZCC = Zone Code Change

Chapter 4.1, *Aesthetics*, Page 4.1-49

Mitigation Measures

MM 4.1-1 Prior to the issuance of a building permit~~s~~ for the proposed project, the project applicant shall submit a proposed color scheme and treatment plan, for review and approval by the Kern County Planning and Natural Resources Department, that will ensure all project facilities blend in with the colors found in the surrounding landscape. All color treatments shall result in matte or nonglossy finishes.

Chapter 4.1, *Aesthetics*, Page 4.1-49

Cumulative development includes an industrial development near the proposed project site~~, as well as the construction of a potential new school for Kern High School District~~. This substantial increase in development will alter the visual character of the area. While other projects in the region would also be required to implement various mitigation measures to reduce impacts associated with visual character, the conversion of land in a presently rural area to industrial, mining, commercial and residential uses cannot be mitigated to a degree that impacts are no longer significant. Therefore, cumulative impacts are considered significant and unavoidable. Development of the proposed project would result in significant impacts associated with visual character in the area. Even with implementation of **Mitigation Measures MM 4.11** through **MM 4.13**, the proposed project's contribution to significant cumulative impacts associated with visual character and quality in the southern San Joaquin Valley would be significant and unavoidable.

Chapter 4.2, *Agriculture and Forestry Resources*, Page 4.2-19

Cumulative Setting, Impacts, and Mitigation Measures

The geographic scope for cumulative impacts to agricultural and forest resources encompasses an approximately 1-mile radius around the project site. As shown in **Chapter 3**, *Project Description*, **Figure**

3-9, *Cumulative Projects*, and **Table 3-5**, *Cumulative Projects List*, of this Draft EIR, there are ~~three~~ thirteen (13) cumulative projects in the project vicinity, including a new warehouse, located immediately adjacent to the project site and located on the same Assessor's Parcel Number~~.~~. The proposed warehouse would be located on Important Farmland and may contribute to a loss of farmland. This represents a potentially cumulative impact.

Chapter 4.2, *Agriculture and Forestry Resources*, Page 4.2-19

As previously discussed, the proposed project would convert approximately 93.74 acres of agricultural land to nonagricultural uses, including approximately 5.54 acres of land to be used for off-site road improvements. Because development of the proposed project would result in conversion of Prime Farmland, or Unique Farmland, ~~or Farmland of Statewide Importance (Farmland)~~, the proposed project's contribution to the conversion of agricultural land to nonagricultural uses would be cumulatively considerable. The proposed project's incremental effect is cumulatively considerable when viewed in connection with the effects of other closely related past projects, the effects of other current projects and the effects of probable future projects, and thus cumulative impacts would be significant and unavoidable.

Chapter 4.2, *Agriculture and Forestry Resources*, Page 4.2-20

~~The proposed project would not result in a significant impact involving the cancellation of an open space contract. Cumulative projects which are subject to Williamson Act Contracts in nonrenewal status, would result in conflicts related to cancellation of an open space contract or a Farmland Security Zone Contract. As explained above under **Impact 4.2-6**, the project site is not subject to a Farmland Security Zone Contract and, therefore, no impacts related to cancellation of a Farmland Security Zone Contract are anticipated.~~

Chapter 4.3, *Air Quality*, Table 4.3-9, Page 4.3-46

Table 4.3-9: Estimated Health Risk During Operation

Risk	Value	SJVAPCD Threshold	Exceeds SJVAPCD Threshold (Y/N)?	Receptor Coordinates (UTM NAD 83 Zone 11)	
				Easting (meters)	Northing (meters)
Cancer PMI Risk (in a million)	~~0.67~~0.84	20 in 1 million	N	316,094	3,901,262
Cancer MEIR Risk (in a million)	~~0.40~~0.495	20 in 1 million	N	316,093	3,901,224
Cancer Sensitive Risk (in a million)	~~0.02~~0.03	20 in 1 million	N	315894	3,899,563
Cancer MEIW Risk (in a million)	~~0.04~~0.02	20 in 1 million	N	314,565	3,901,240
Chronic PMI HI	<0.001	1.0	N	316,094	3,901,262
Chronic MEIR HI	<0.001	1.0	N	316,093	3,901,224
Chronic Sensitive HI	<0.001	1.0	N	315894	3,899,563
Chronic MEIW HI	<0.001	1.0	N	314,565	3,901,240

Table 4.3-9: Estimated Health Risk During Operation

Risk	Value	SJVAPCD Threshold	Exceeds SJVAPCD Threshold (Y/N)?	Receptor Coordinates (UTM NAD 83 Zone 11)	
				Easting (meters)	Northing (meters)

Notes:
NAD = North American Datum
UTM = Universal Transverse Mercator
HI = Hazard Index
MEIR = Maximally Exposed Individual Resident
MEIW = Maximally Exposed Individual Worker
PMI = point of maximum impact
SJVAPCD = San Joaquin Valley Air Pollution Control District
Source: FirstCarbon Solutions (FCS) 2023.

Chapter 4.3, *Air Quality*, Page 4.3-32 through 4.3-33

Construction

The proposed project would comply with all applicable SJVAPCD rules and regulations. The proposed project would not exceed any SJVAPCD significance thresholds on an annual basis, as shown in **Table 4.3-6** and **Table 4.3-7**. Additionally, as discussed in more detail below under the localized impact analysis, the emissions from construction of the proposed project would not exceed the SJVAPCD daily localized significance thresholds for NOx, CO, and PM_{10}. Therefore, emissions are presumed to be below levels that would result in localized exceedances of the Ambient Air Quality Standards (AAQS) and a project-specific AAQA was not required. Moreover, emissions would be further reduced with the required compliance of the proposed project with SJVAPCD's Rule 9510 (ISR Rule), which requires projects to reduce NO_x emissions by 20 percent. Therefore, the proposed project would not result in emissions of a magnitude that would obstruct the air quality planning goals set forth by the SJVAPCD and would have a less than significant impact. During construction, the proposed project would incorporate **Mitigation Measure MM 4.3-1** through **MM 4.3-~~9~~5** in order to further reduce impacts from fugitive dust, including applying dust suppressant material; limiting vehicle speeds; and watering exposed areas during construction, among others.

Because the proposed project does not include any stationary sources, the stationary control measures identified in the SJVAPCD's *2016 Ozone Plan* and Kern County's *2017 Ozone Attainment Plan* are not applicable. Similarly, the proposed project's construction emissions from heavy-duty, off-road equipment would not exceed the SJVAPCD's significance thresholds, as shown in **Table 4.3-6**. The mobile source control measures pertaining to heavy-duty, off-road equipment identified in the SJVAPCD's *2016 Ozone Plan* are also not applicable. Therefore, the proposed project's construction activities would neither conflict with nor obstruct implementation of the applicable AQPs.

Overall, based on the above, with implementation of **Mitigation Measures MM 4.3-1** through **MM 4.3-~~9~~5**, any potential impacts to criteria pollutants designated as nonattainment within the SJVAPCD would be

reduced and construction of the proposed project would not result in a conflict with or obstruct implementation of applicable AQPs. Therefore, the impacts from construction would be less than significant.

Operation

The proposed project is not consistent with the existing land use designations in the current Metropolitan Bakersfield General Plan and would require a zoning change. As such the proposed project introduces employment and an increase in VMT and associated criteria pollutant emissions. When compared against the current zoning of the project site that would allow for the development of agricultural uses, the facility would result in increased emissions from baseline emissions for mobile and area source. However, as shown in **Table 4.3-7**, the proposed project would not exceed the SJVAPCD's regional operational threshold for any criteria air pollutant. Operational emissions would be further reduced with implementation of mitigation measures, which would be implemented to further reduce impacts to criteria pollutants designated as nonattainment within the SJVAPCD. Therefore, impacts would be less than significant with mitigation measures incorporated.

Mitigation Measures

MM 4.3-3 ~~The proposed project shall continuously comply with the following:~~ The project proponent and/or its contractors shall implement the following measures during construction of the project:

a. All equipment shall be maintained in accordance with the manufacturer's specifications.
b. Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for extended periods of time.
c. Construction equipment shall <u>not</u> operate longer than eight cumulative hours per day <u>without prior written authorization provided by the Kern County Planning and Natural Resources Department</u>.
d. Electric equipment shall be used whenever possible in lieu of diesel- or gasoline-powered equipment.
e. All construction vehicles shall be equipped with proper emissions control equipment and kept in good and proper running order to substantially reduce NOX emissions.
f. On-road and off-road diesel equipment shall use diesel particulate filters (or the equivalent) if permitted under manufacturer's guidelines.
g. Tier 3 engines shall be used on all equipment when available.

MM 4.3-5 Prior to issuance of any grading or construction permits the Owner/Operator shall enter into an Developer Mitigation Agreement (DMA) with the San Joaquin Valley Air Pollution Control District. The DMA is to <u>fully</u> mitigate <u>construction and operations</u> criteria emissions of the warehouse project implementation~~, not required to be offset under a District rule,~~ and for Project vehicle and all other mobile source emissions. The Owner/operator shall pay fees to fully ~~offset~~ <u>mitigate</u> Project emissions of NO_X (oxides of nitrogen), ROG (reactive organic gases), PM_{10} (particulate matter of 10 microns or less in diameter), and $PM_{2.5}$ (particulate matter of 2.5 microns or less in diameter) ~~(including as applicable mitigating for reactive organic gases by additive reductions of particulate matter of 10 microns or less in diameter)~~ (collectively, "designated criteria emissions") to avoid any net increase in these pollutants. The air quality mitigation fee shall ~~further~~ be paid prior to the approval of any construction or grading approval ~~and shall be used to reduce~~

~~designated criteria emissions to fully offset Project emissions that are not otherwise required to be fully offset by District permit rules and regulations~~.

Chapter 4.3, *Air Quality*, Page 4.3-48

While construction dust suppression measures would be implemented in **Mitigation Measure MM 4.3-1 through MM 4.3-9**, exposure to dust during construction could still occur which could increase the health susceptibility and increase the severity of the disease. ~~There is no vaccine to date for COVID-19.~~ In addition to implementation of **Mitigation Measure MM 4.3-1 through MM 4.3-9**, the proposed project would implement **Mitigation Measure MM 4.3-~~10~~8**, which requires implementation of a COVID-19 Health and Safety Plan in accordance with the Kern County Public Health Services Department and Kern County Health Officer mandates.

Therefore, implementation of **Mitigation Measure MM 4.3-1 through MM 4.3-10** would be required to reduce the proposed project's regional and localized health effects associated with criteria air pollutants and COVID-19; however, the exact reduction from implementation of these mitigation measures cannot be quantified given existing scientific constraints.

Chapter 4.4, *Biological Resources,* Page 4.4-34 through 4.4-36

MM 4.4-2 Prior to the issuance of grading or building permits and for the duration of construction activities, all new construction workers at the project site shall attend an Environmental Awareness Training and Education Program, developed and presented by the Lead Biologist. Any employee responsible for the operations and maintenance ~~or decommissioning~~ of the project facilities shall also attend the Environmental Awareness Training and Education Program.

a. The Training Program shall include, but not be limited to, information on the life history of species (if applicable) including the blunt-nosed leopard lizard, San Joaquin whipsnake, coast horned lizard, burrowing owl, Swainson's hawk, prairie falcon, Le Conte's thresher, Nelson's antelope squirrel, giant kangaroo rat, short-nosed kangaroo rat, Tipton kangaroo rat, Tulare grasshopper mouse, San Joaquin pocket mouse, American badger, nesting birds, and San Joaquin kit fox, as well as other wildlife and plant species that may be encountered during construction activities, their legal protections, the definition of "take" under the Endangered Species Act, measures to protect the species, reporting requirements, specific measures that each worker shall employ to avoid take of wildlife species, and penalties for violation of the Act.
b. To ensure employees and contractors understand their roles and responsibilities, training may be conducted in languages other than English.
c. An acknowledgment form signed by each worker indicating that Environmental Awareness Training and Education Program has been completed would be kept on record.
d. A sticker shall be placed on hard hats indicating that the worker has completed the Environmental Awareness Training and Education Program. Construction workers shall not be permitted to operate equipment within the construction areas unless they have attended the Environmental Awareness Training and Education Program and are wearing hard hats with the required sticker.

e. A copy of the training transcript and/or training video, as well as a list of the names of all personnel who attended the Environmental Awareness Training and Education Program and copies of the signed acknowledgment forms shall be submitted to the Kern County Planning and Natural Resources Department.
f. The construction crews and contractor(s) shall be responsible for unauthorized impacts from construction activities to sensitive biological resources that are outside the areas defined as subject to impacts by project permits.
g. An Operation and Maintenance-phase version of the Environmental Awareness Training and Education Program will be maintained on-site for review as may be necessary during the life of the project.
h. All vehicles will be directed to exercise caution when commuting within the project area. A 15 mile per hour (mph) speed limit shall be enforced on unpaved roads.
i. Project employees will be provided with written guidance governing vehicle use, speed limits on unpaved roads, fire prevention, and other hazards.
j. A litter control program shall be instituted at the project site. All workers shall ensure their food scraps, paper wrappers, food containers, cans, bottles, and other trash from the project area are deposited in covered or closed trash containers. The trash containers shall be removed from the project area at the end of each working day.
k. No canine or feline pets or firearms (except for federal, State, or local law enforcement officers and security personnel) shall be permitted on construction sites to avoid harassment, killing, or injuring of listed species.
l. Maintenance and construction excavations greater than 2 feet deep shall be covered, filled in at the end of each working day, or have earthen escape ramps no greater than 200 feet apart provided to prevent entrapment of listed species.
m. All construction activities shall be confined within the project construction area, which may include temporary access roads, haul roads, and staging areas specifically designated and marked for these purposes. At no time shall equipment or personnel be allowed to adversely affect areas outside the project site.
n. Because dusk and dawn are often the times when listed species are most actively foraging, all construction activities shall cease 0.5 hour before sunset and shall not begin prior to 0.5 hour before sunrise. Except when necessary for driver or pedestrian safety, lighting of the project site by artificial lighting during nighttime hours is prohibited.
o. Tightly woven fiber netting or similar material shall be used for erosion control or other purposes at the project site to ensure that special-status species do not get trapped. This limitation will be communicated to the contractor through use of Special Provisions included in the bid solicitation package.
p. Use of rodenticides and herbicides at the project site shall be avoided to the maximum extent feasible. If use is unavoidable, rodenticides and/or herbicides shall be utilized in such a manner to prevent primary or secondary poisoning of special-status species and depletion of prey populations on which they depend. All uses of such compounds shall observe labels and other restrictions mandated by the United States Environmental Protection Agency (EPA), California Department of Pesticide Regulation, and other appropriate State and federal regulations as well as additional project-related restrictions deemed necessary by the United States Fish and Wildlife Service (USFWS) or California Department of Fish and Wildlife (CDFW).

Chapter 4.4, *Biological Resources,* Page 4.4-37

MM 4.4-4 If construction activities are conducted during the typical nesting bird season (February 15 through September 15), pre-construction surveys shall be conducted by a qualified Biologist prior to any site preparation and/or construction activity to identify potential nesting bird activity. The survey area shall include a 500-foot buffer surrounding the property. Swainson's hawk protocol-level surveys shall be consistent with the survey methods developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC 2000); If no active nests are found within the survey area, no further mitigation is required. If nesting activity is identified during the pre-construction survey process, the following measures will be implemented:

a. If active nest sites of bird species protected under the Migratory Bird Treaty Act and/or California Fish and Game Code are observed within the project site, then the project will be modified and/or delayed as necessary to avoid direct take of the identified nests, eggs, and/or young.
b. If active nest sites of raptors and/or bird species of special concern are observed within the vicinity of the project site, then the appropriate buffer around the nest site (typically 250 feet for passerines and 500 feet for raptors) shall be established. Construction activities in the buffer zone shall be prohibited until the young have fledged the nest and achieved independence.
c. Active nests shall be documented by a qualified Biologist, and a letter report shall be submitted to the Kern County Planning and Natural Resources Department documenting project compliance with the MBTA and California Fish and Game Code.

Chapter 4.4, *Biological Resources,* Page 4.4-40

MM 4.4-9 Pre-construction protocol-level surveys by a qualified Biologist for nesting birds shall be required if construction activities are scheduled to occur during the breeding season for raptors and other migratory birds (February 1– August 31), to reduce potential impacts to nesting birds and raptors. The survey shall be conducted within 30 days of ground disturbance activities.

~~a.~~ If any nesting birds/raptors are observed, a qualified Biologist shall determine buffer distances and/or the timing of project activities so that the proposed project does not cause nest abandonment or destruction of eggs or young. This measure shall be implemented so that the proposed project remains in compliance with the Migratory Bird Treaty Act (MBTA) and applicable State regulations.

Chapter 4.4, *Biological Resources,* Impact 4.4-4, Page 4.4-42

Mitigation Measures

Implementation of **Mitigation Measures MM 4.4-43** ~~**and MM 4.4-10**~~ through **4.4-11** would be required.

Level of Significance After Mitigation

With implementation of **Mitigation Measures MM 4.4-43** ~~and **MM 4.4-10**~~ through **4.4-11**, impacts would be less than significant.

Chapter 4.8, *Greenhouse Gas Emissions,* Page 4.8-23

Best Management Practices for Warehouses

In response to the increase in warehouse development in California, the California Attorney General's Bureau of Environmental Justice published a Memorandum entitled "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" (Warehouse Projects Best Practices Memorandum) (published in March 2021 and updated September 2022).

The Memorandum encourages warehouse projects to implement certain best practices and mitigation measures including those related to community engagement, siting and design considerations, and air quality and greenhouse gas emissions. As demonstrated below, a vast majority of best practices either have since become required by law or otherwise implemented as part of the project's Air Quality, Greenhouse Gas Emissions, and Transportation mitigation measures. These measures will be enforced by Kern County, and will be incorporated into the Project's Mitigation Monitoring & Reporting Program.

A summary of the measures incorporated into the Project and the EIR is provided below, in Table 4.8-5.

Table 4.8-5: Project Incorporation of Best Practices

Best Practice Measure	Applicability and Incorporation
Community Engagement	
Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The information should be in a format that is easy to navigate and understand for members of the affected community.	**Incorporated.** The project's Notice of Preparation was published on October 17, 2023, which includes a complete and accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. A public Scoping Meeting was held on November 8, 2023. Notices were mailed to reviewing agencies and to residents and owners within 1,000 feet of the project site. Additionally, notices were available in person at the County and on the County's website.
Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project	
Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community relations officer to the surrounding community.	**Incorporated.** Pursuant to Mitigation Measure MM 4.3-10, the project applicant shall establish a construction coordinator who will respond to any local compliant about construction activities, ensure all appropriate construction notices have been made available to the public and all construction signs have been installed, and

Best Practice Measure	**Applicability and Incorporation**
	maintain an ongoing log of all construction-related complaints.
Warehouse Siting and Design Considerations	
Creating physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are likely to be present, such as homes, schools, daycare centers, hospitals, community centers, and parks.	**Incorporated.** There are no sensitive receptors immediately adjacent to the project site, as the site is surrounded by predominately agricultural uses and bordered by established roads along the northern and western project boundaries, providing additional buffers between the site and the nearest receptors. Nonetheless, pursuant to Mitigation Measure MM 4.1-3, the project applicant shall submit a landscape plan that complies with the Kern County Zoning Ordinance requirements in Chapter 19.86–Landscaping. Specifically, the landscape plan requires a 20-foot wide perimeter buffer along any visible boundary from the Houghton Road and Wible Road frontages consisting of ground cover, shrubs, and trees.
Providing adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets.	**Incorporated.** Project plans have been reviewed by the County for adequate onsite parking and queuing in order to prevent trucks from parking or idling on public streets. Additionally, pursuant to Mitigation Measure MM 4.2-3, the project shall be designed to reduce conflicts between project operation and adjacent uses by considering designs include, but not limited to, prohibition of off-site parking.
Screening dock doors and onsite areas with significant truck traffic with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.	**Incorporated.** Pursuant to Mitigation Measure MM 4.1-3, the project applicant shall submit a landscape plan that complies with the Kern County Zoning Ordinance requirements in Chapter 19.86–Landscaping. Specifically, the landscape plan requires a 20-foot wide perimeter buffer along any visible boundary from the Houghton Road and Wible Road frontages consisting of ground cover, shrubs, and trees.
Air Quality and Greenhouse Gas Emissions Analysis and Mitigation	
Requiring off-road construction equipment to be zero-emission, where available, and all diesel-fueled off-road construction equipment, to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.	**Largely incorporated.** Pursuant to Mitigation Measure MM 4.3-3, on-road and off-road diesel equipment shall use diesel particulate filters (or the equivalent) if permitted under manufacturer's guidelines. In addition, Tier 3 engines shall be used on all equipment when available
Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.	**Incorporated.** As required by Mitigation Measure MM 4.3-3 C), construction equipment shall not operate longer

Best Practice Measure	Applicability and Incorporation
	than eight cumulative hours per day. Therefore, MM 4.3-3 is more stringent and effective than this recommended measure.
Providing electrical hook ups to the power grid, rather than use of diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and using electric tools whenever feasible.	**Incorporated.** As required by Mitigation Measure MM 4.3-3 D), electric equipment shall be used whenever possible in lieu of diesel- or gasoline-powered equipment.
Forbidding idling of heavy equipment for more than two minutes.	**Largely Incorporated.** The ARB's Regulation for In-Use Off-Road Diesel Vehicles currently limits idling to no more than five consecutive minutes.
Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.	**Incorporated.** As required by MM 4.3-3 A), all equipment shall be maintained in accordance with the manufacturer's specifications.
Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.	**Incorporated.** Pursuant to Mitigation Measure 4.3-3, the Lead Agency shall conduct an on-site inspection to verify compliance with construction mitigation.
Requiring on-site equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.	**Incorporated.** As required by Mitigation Measure MM 4.8-1, only electric-powered off-road equipment (e.g., forklifts, indoor material handling equipment, etc.) shall be utilized on-site for daily warehouse and business operations.
Forbidding trucks from idling for more than two minutes and requiring operators to turn off engines when not in use.	**Largely Incorporated.** Title 13, CCR, section 2485, currently limits idling of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds to no more than five consecutive minutes.
Constructing electric truck charging stations proportional to the number of dock doors at the project.	**Incorporated.** As discussed in Section 4.8, Greenhouse Gas Emissions, the proposed project would include infrastructure for EV charging stations, including for trucks, into a minimum of 20 percent of all vehicle parking spaces (including parking for trucks), consistent with the applicable California Green Building Standards Code Tier 1 Nonresidential Mandatory Measure. Furthermore, CALGreen 2022 update requires loading to the future location of the charging for medium- and heavy-duty ZEVs. For warehouses with greater than 256,000 square feet such as the proposed Project, 400 KVA of additional capacity required for raceway, busway, transformer, and panel.
Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.	
Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck	**Incorporated.** Mitigation Measure MM 4.8-2 requires the warehouse usage shall be limited to dry storage.

Best Practice Measure	**Applicability and Incorporation**
operators with transport refrigeration units to use the electric plugs when at loading docks.	
Installing solar photovoltaic systems on the project site of a specified electrical generation capacity, such as equal to the building's projected energy needs.	**Incorporated.** The 2022 Building Energy Efficiency Standards (Energy Code) has solar photovoltaic (solar PV) system requirements for all newly constructed nonresidential buildings. Pursuant to Energy Code Section 140.10, The required solar PV system is intended to offset the annual electrical consumption of a mixed-fuel building such that it will self-utilize about 80 percent of the annual solar PV generation without battery storage, and about 90 percent with battery storage, over a year.
Improving and maintaining vegetation and tree canopy for residents in and around the project area.	**Incorporated.** The project would include onsite and offsite landscaping, including trees having a minimum planting height of six (6) feet.
Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.	**Incorporated.** SJVAPCD Rule 8061 requires municipalities to sweep paved roads at least once per month with PM_{10} efficient units.
Directing all lighting at the facility into the interior of the site.	**Incorporated.** Pursuant to Mitigation Measure MM 4.1-4, All lighting shall be directed downward and shielded to focus illumination on the desired areas only and avoid light trespass into adjacent areas.
Using full cut-off light shields and/or anti-glare lighting.	**Incorporated.** Pursuant to Mitigation Measure MM 4.1-4, all outdoor lighting shall be designed so that all direct lighting is confined to the project site property lines and that adjacent properties and roadways are protected from spillover light and glare.
Installing climate control in the warehouse facility to promote worker well-being. Installing air filtration in the warehouse facility to promote worker well-being.	**Incorporated.** Proposed buildings would be consistent with the requirements of the California Building Code, including installing required climate control and air infiltration.

In addition to the measures specifically related to the Warehouse Projects Best Practices Memorandum above, Mitigation Measure MM 4.8-1 requires the project proponent utilize only electric-powered off-road equipment (e.g., forklifts, indoor material handling equipment, etc.) for daily warehouse operations, track and report efforts to recycle construction wastes, marking equipment containing more than five pounds of refrigerant for identification, and use of automatic lights where feasible to do so.

Further, as part of MM 4.3-5, the project applicant would pay fees to *fully* offset Project emissions of NO_X, ROG, PM_{10}, and $PM_{2.5}$ to avoid any net increase in these pollutants. The payment would fund SJVAPCD's emission reduction programs. Types of emission reduction projects that have been funded in the past include electrification of stationary internal combustion engines (such as agricultural irrigation pumps), replacing diesel school buses, and replacement of old farm tractors. A full analysis of the SJVAPCD Emission reduction program is found in Appendix B.1. These emission offsets and emission reduction projects would further reduce GHG emissions within the Air Basin.

Chapter 4.8, *Greenhouse Gas Emissions,* Page 4.8-25

MM 4.8-1

a. Prior to issuance of occupancy permits, the project developer shall disclose to all tenants/business entities that only electric-powered off-road equipment (e.g., forklifts, indoor material handling equipment, etc.) shall be utilized on-site for daily warehouse and business operations. The limitation on using only electric-powered off-road equipment shall be included in all leasing agreements.

b. Prior to issuance of grading or building permits, the project construction's General Contractor shall target construction waste diversion rate of 80 percent. A monthly construction report shall be provided to the County documenting total waste generated, types of waste streams and total recycled.

c. During operation and to the extent feasible for safe warehouse operations, automatic light switches shall be incorporated into the project.

e. During operation, any equipment containing greater than five pounds of refrigerant, procured or installed shall be tagged so that project applicant and tenant can identify and verify all installed equipment.

Chapter 4.8, *Greenhouse Gas Emissions,* Page 4.8-26

Table 4.8-~~5~~6, *Proposed Project Consistency with 2017 Scoping Plan Greenhouse Gas Emission Reduction Strategies* and **Table 4.8-~~6~~7,** *Proposed Project Consistency with 2022 Scoping Plan Greenhouse Gas Emission Reduction Strategies* summarize the measures included 2017 and 2022 Scoping Plans, respectively, and analyzes project consistency compared to these elements.

Table 4.8-~~5~~6: Proposed Project Consistency with 2017 Scoping Plan Greenhouse Gas Emission Reduction Strategies

Chapter 4.8, *Greenhouse Gas Emissions,* Page 4.8-29

Table 4.8-~~6~~7: Proposed Project Consistency with 2022 Scoping Plan Greenhouse Gas Emission Reduction Strategies

Chapter 4.8, *Greenhouse Gas Emissions,* Page 4.8-31

As shown in **Table 4.8-~~5~~6** and **Table 4.8-~~6~~7** above, the proposed project is consistent with most of the applicable measures in the 2017 Scoping Plan and the 2022 Scoping Plan Update with incorporation of **Mitigation Measures MM 4.8-1** and **MM 4.8-2**.

Chapter 4.8, *Greenhouse Gas Emissions,* Page 4.8-32

~~Consideration of~~ Mitigation Measures Considered and Rejected

The Office of the California Attorney General maintains a website with a list of CEQA mitigation measures for global climate change impacts. The Attorney General has listed some examples of types of mitigation measures that local agencies may consider to offset or reduce global climate change impacts from a project.

More recently, the Attorney General published the Warehouse Projects Best Practices Memorandum discussed in Impact 4.8-1. The Attorney General ensures that the presented lists are examples and not intended to be exhaustive, but instead provide measures and policies that could be undertaken. Moreover, the measures cited may not be appropriate for every project, so the Attorney General suggests that the lead agency should use its own informed judgment in deciding which measures it would analyze, and which measures it would require, for a given project.

~~The Attorney General suggests measures that could be undertaken or funded by a diverse range of projects, related to energy efficiency; renewable energy; water conservation and efficiency; solid waste measures; land use measures; transportation and motor vehicles; and carbon offsets. However, most of the suggested measures would not be applicable to the proposed project, since they are more appropriate and applicable measures to reduce long-term operational GHG emissions.~~ As discussed fully in Impacts 4.8-1 and 4.8-2, the proposed project has implemented all feasible and applicable measures to reduce air quality and GHG emissions. Either through regulatory compliance or mitigation measures, the proposed project would implement a vast majority of the recommended measures from the Attorney General's Warehouse Projects Best Practices Memorandum, carry out other state-of-the-art efficiency measures, and fully offset Project emissions of NO_X, ROG, PM_{10}, and $PM_{2.5}$ to avoid any net increase in these pollutants. The payment would fund SJVAPCD's emission reduction programs and further reduce GHG emissions within the Air Basin.

CEQA does not require the County to utilize achieving net-zero GHG emissions as a significance threshold to evaluate the proposed project. Moreover, Lead Agencies have discretion to formulate their own significance thresholds (State CEQA Guidelines Section 15064.7(b)). The determination by a lead agency of whether a project may have a significant effect on the environment calls for careful judgment, based to the extent possible, on scientific and factual data (State CEQA Guidelines Section 15064(b)(1)). Thus, establishing a single threshold of significance, while desirable in certain instances, may not be possible for every environmental impact, because the significance of an impact may vary with the setting. The final determination of whether a project is significant is within the purview of the County, as lead agency pursuant to Section 15064(b) of the CEQA Guidelines.

Here, the County has chosen to evaluate the proposed project against applicable State and regional GHG reduction plans, including ARB 2017 scoping plan, 2022 scoping plan update, and RTP/SCS. The proposed project would be consistent with most of the applicable scoping plan policies. ~~The impacts on global warming and climate change are indirect, climate change is a worldwide phenomenon, and project-level emissions cannot be correlated with specific impacts based on currently available science.~~ However, based on the analysis above, the proposed project would not align with the State's planning goals and milestones under SB 32 and AB 1279 due to the proposed project's VMT per–capita. Feasible and enforceable mitigation with a nexus to the project's VMT impact were considered in the proposed project's VMT impact and in Section 4.17, *Transportation*. Although the proposed project would be required to implement a TDM program to reduce VMT, it is unclear whether the TDM program would reduce project VMT to the VMT reduction targets set forth in the Kern COG RTP/SCS. Therefore, the proposed project is expected to significantly contribute to global warming or climate change.

Chapter 4.9, *Hazards and Hazardous Materials,* Page 4.9-20

MM 4.9-6 Prior to start of construction, the abandoned petroleum prospect well shall be located, exposed, and re-abandoned, if required, to conform to the current abandonment requirements of the California Department of Conservation, ~~Division of Oil, Gas and~~

~~Geothermal Resources~~ Geologic Energy Management Division (CalGEM) and the Kern County Department of Environmental Health Services.

MM 4.9-7 The following note shall appear on all final maps and grading plans:

If during grading or construction, any plugged and abandoned or unrecorded wells are uncovered or damaged, the California Department of Conservation, ~~Oil, Gas and Geothermal Resources~~ Geologic Energy Management Division (CalGEM) will be contacted to inspect and approve any remediation required.

Chapter 4.9, *Hazards and Hazardous Materials,* Page 4.9-25 through 4.9-26

MM 4.9-14 Prior to issuance of a grading or building permit, a Maintenance, Trash Abatement, and Pest Management Program shall be submitted for review and approval to the Kern County Planning and Natural Resources Department. The program shall include, but not be limited to the following:

a. The project applicant shall clear debris from the project area at least four times per year; this can be done in conjunction with regular ~~panel washing and~~ site maintenance activities.
b. The project applicant shall erect signs with contact information for the project proponent/operator's maintenance staff at regular intervals along the site boundary, as required by the Kern County Planning and Natural Resources Department. Maintenance staff shall respond within two weeks to resident requests for additional cleanup of debris. Correspondence with such requests and responses shall be submitted to the Kern County Planning and Natural Resources Department.
c. The project applicant shall implement a regular trash removal and recycling program on an ongoing basis during construction and operation of the project. Barriers to prevent pest/rodent access to food waste receptacles shall be implemented. Locations of all trash receptacles during operation of the project shall be shown on final plans.
d. Trash and food items shall be contained in closed containers to be locked at the end of the day and removed at least once per week to reduce the attractiveness to opportunistic predators such as common ravens, coyotes, and feral dogs.

Chapter 4.9, *Hazards and Hazardous Materials,* Page 4.9-27

Impact 4.9-8: The project would generate vectors (flies, mosquitoes, rodents, etc.) or have a component that includes agricultural waste. Specifically, the project would ~~not~~ exceed the following qualitative threshold: the presence of domestic flies, mosquitoes, cockroaches, rodents, and/or any other vectors associated with the project is significant when the applicable enforcement agency determines that any of the vectors:

i. Occur as immature stages and adults in numbers considerably in excess of those found in the surrounding environment; or
ii. Are associated with design, layout, and management of project operations; or
iii. Disseminate widely from the property; or

iv. Cause detrimental effects on the public health or well-being of the majority of the surrounding population.

Chapter 4.10, *Hydrology and Water Quality,* Page 4.10-16 through 4.10-17

MM 4.10-1 Prior to issuance of a grading permit, the project proponent/operator shall submit a Stormwater Pollution Prevention Plan for review and approval by the Kern County Planning and Natural Resources Department and/or Kern County Public Works Department. The Stormwater Pollution Prevention Plan shall be designed to minimize runoff and shall specify Best Management Practices to prevent all construction pollutants from contacting stormwater, with the intent of keeping sediment or any other pollutants from moving off-site and into receiving waters. The requirements of the Stormwater Pollution Prevention Plan shall be incorporated into design specifications and construction contracts. Recommended best management practices to be incorporated in the Stormwater Pollution Prevention Plan shall include the following:

a. Minimization of vegetation removal;
b. Implementing sediment controls, including silt fences as necessary;
c. Installation of a stabilized construction entrance/exit and stabilization of disturbed areas;
d. Properly containing and disposing of hazardous materials used for construction on-site.
e. Properly covering stockpiled soils to prevent wind erosion;
f. Proper protections and containment for fueling and maintenance of equipment and vehicles; ~~and~~
g. Appropriate disposal of demolition debris, concrete and soil, and aggressively controlling litter.
h. Cleanup of silt and mud on adjacent street due to construction activity.
i. Checking all lined and unlined ditches after each rainfall.
j. Restore all erosion control devices to working order to the satisfaction of the Kern County Planning and Natural Resources Department and/or Kern County Public Works Department after each rainfall run-off.
k. Install additional erosion control measures as may be required due to uncompleted grading operations or unforeseen circumstances which may arise.

Chapter 4.13, *Noise,* Page 4.13-24 through 4.13-25

MM 4.13-1 The following measures are required to reduce short- term noise levels associated with project construction:

~~1~~a. Construction activities at the project site shall comply with the hourly restrictions for noise-generating construction activities, as specified in the Kern County Noise Ordinance (Municipal Ordinance Code 8.36.020). Accordingly, construction activities shall be prohibited between the hours of 9:00 p.m. to 6:00 a.m. on weekdays, and between 9:00 p.m. to 8:00 a.m. on weekends. These hourly limitations shall not apply to activities where hourly limitations would result in increased safety risk to workers or the public.

~~2~~b. Equipment staging and laydown areas shall be located at the farthest practical distance from nearby residential land uses. To the extent possible, staging and laydown areas should be located at least 500 feet of existing residential dwellings.

~~3~~c. Where feasible construction equipment shall be fitted with approved noise- reduction features such as mufflers, baffles and engine shrouds that are no less effective than those originally installed by the manufacturer.
4d. Haul trucks shall not be allowed to idle for periods greater than five minutes, except as needed to perform a specified function (e.g., concrete mixing).
~~5~~e. On-site vehicle speeds shall be limited to 15 miles per hour, or less (except in cases of emergency).
~~6~~f. Backup beepers for all construction equipment and vehicles shall be broadband sound alarms or adjusted to the lowest noise levels possible, provided that the Occupational Safety and Health Administration and California Division of Occupational Safety and Health's safety requirements are not violated. On vehicles where backup beepers are not available, alternative safety measures such as escorts and spotters shall be employed.

MM 4.13-2 Prior to the issuance of grading permits, a "Noise Disturbance Coordinator" shall be established. The project operator shall submit evidence of methods of implementation and shall continuously comply with the following during construction:

~~1~~a. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise.
b. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved.

Chapter 4.19, *Utilities and Service Systems,* Page 4.19-16

MM 4.19-2 Proposals and plans for package treatment and disposal facilities shall be subject to the review and approval of:

~~1~~a. The State and County Environmental Health Services Departments for design and contamination aspects;

~~2~~b. The Regional Water Quality Control Board for elements of pollution and nuisance; and
~~3~~c. The Kern County Public Works Department for structural and mechanical integrity. Special structures, such as pump stations, pressure lines and sags, etc. shall be subject to the approval of the Kern County Public Works Department and the maintaining District.

Chapter 4.19, *Utilities and Service Systems,* Page 4.19-16

Implementation of **Mitigation Measure MM 4.19-9** would ensure compliance with all waste diversion and recycling requirements by requiring recycling during construction~~,~~ and operation~~, and decommissioning~~ of the project.

Chapter 6.0, *Alternatives,* Page 6-8

TABLE 6-1: SUMMARY OF DEVELOPMENT ALTERNATIVES

Alternative	Description	Basis for Selection and Summary of Analysis
Alternative 3: Alternative Site Alternative	Construction and operation of the warehouse and associated development on an alternative site located approximately 50 miles southeast of the proposed project site. Required entitlements for the Alternative Site Alternative would be dependent on the site selected.	• Similar impacts to ~~aesthetics, agriculture and forestry resources,~~ air quality, energy, GHG emissions, public services, recreation. • Greater impacts to all other issue areas. • No issue areas with less impact.

Chapter 6.0, *Alternatives,* Page 6-19

With regard to exposure to sensitive receptors, the Reduced Footprint Alternative would have a decreased impact compared to the proposed project due to its smaller size. While the proposed project has the potential to expose sensitive receptors to substantial pollutant concentrations during construction, implementation of **Mitigation Measures MM 4.3-1** ~~and~~ through **MM 4.3-10** would reduce impacts to less than significant levels. Accordingly, the Reduced Footprint Alternative would reduce the operations and, in turn, the possible impact on nearby sensitive receptors. As such, project-level impacts would be less than significant and less than the proposed project.

Chapter 6.0, *Alternatives,* Page 6-24

Noise

The amount of on-site construction equipment for this alternative is assumed to be similar to the proposed project. As with the proposed project, construction ~~and decommissioning~~ activities associated with the Reduced Footprint Alternative would not result in any impacts related to noise levels and would not exceed existing thresholds.

The vibration levels at the nearest residences would not reach the vibration level threshold for older residential structures during construction ~~or decommissioning~~.

Chapter 6.0, *Alternatives,* Page 6-35

Noise

The vibration levels at the nearest residences would not reach the vibration level threshold for older residential structures during construction ~~or decommissioning~~.

Chapter 10.0, *Bibliography*

This section has been updated to reflect minor typographical errors to clarify and amplify citations. Minor revisions are identified to reflect inadvertent omissions and to update to remove documents that were inadvertently included, but not utilized in the preparation of the document. None of these revisions result in any changes to the analysis or conclusions in the document. Nor do any of these changes reflect significant new information.

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The concentration output files from AERMOD were postprocessed in the Hot Spots Analysis and Reporting Program (HARP) Air Dispersion Modeling and Risk Tool (ADMRT) to determine the concentration of DPM at off-site receptors for the modeled emission scenarios. The HARP ADMRT program uses the concentrations, along with equations from the Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments,[21] to estimate the project's cancer and non-cancer chronic health risks. For DPM, the only exposure pathway is inhalation, and the HARP ADMRT tool evaluates exposure from this single pathway.[22] The risk assessment was carried out using ~~recommended~~ SJVAPCD requirements for a 70-year residential cancer risk based on OEHHA derived exposure assumptions.

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No adjustments are made for adult exposure for ages greater than 16. OEHHA and SJVAPCD Health Risk assessment protocols specify HRAs for residential exposure should start with exposure starting at third trimester and this approach is used for both the Construction and Operational HRA for the project.

The HRA analysis utilizes the district required OEHHA Derived Method for determining the Intake Rate Percentile. The derived approach method uses high-end (95 percentile) exposure estimates for the pathways that are the main drivers of exposure and the average point estimate for the other non-driving exposure pathways. Since DPM exposure is only via a single (inhalation) pathway, this is the same as a high-end estimate exposure approach for inhalation (or breathing rates).

~~The analysis utilized the Risk Management Plan (RMP) for evaluating an individual receptor based on a 70-year residential exposure over a 70-year averaging period. Specifically, the policy recommends using the 95th percentile breathing rate for age groups less than 2 years old and the 80th percentile breathing rate for age groups that are greater than or equal to 2 years old.~~

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Table 3: Estimated Health Risks and Hazards During Project Operation

Source	UTM Easting (m)	UTM Northing (m)	DPM Concentration (ug/m^3)	Cancer Risk (risk per million)	Chronic Non-Cancer HI[1]
Point of Maximum Impact	316094	3901262	0.0008	0.~~59~~84	<0.001
Maximum Impacted Residential Receptor	316093	3901224	0.00047	0.~~35~~495	<0.001
General Shafter Elementary	315894	3899563	0.00003	0.0~~2~~3	<0.001
Off-Site Worker Receptor	314565	3901240	0.00026	0.0~~4~~2	<0.001

Notes:
MIR = Maximally Impacted Sensitive Receptor
[1] Chronic non-cancer HI was estimated by dividing the maximum annual DPM concentration (as PM_{10} exhaust) by the REL of 5 μg/m^3.
[2] Risk is based on Infant Exposure starting in Third Trimester and over the construction period.
Source: Appendix B.
The MIR was determined to be a residence located approximately at 316093 m E 3901224 m N along Houghton Road.

Appendix B.1, *Air Quality, Greenhouse Gas Emissions, and Energy Analysis Report,* Appendix A, CalEEMod Output

Appendix A, CalEEMod Output, has been updated to reflect minor clarification in methodology used for health risk assessment and associated modeling results.

Appendix B.1, *Air Quality, Greenhouse Gas Emissions, and Energy Analysis Report,* Appendix B, Health Risk Assessment Supporting Information

Appendix B, Health Risk Assessment Supporting Information, has been updated to reflect minor clarification in methodology used for health risk assessment and associated modeling results.

Appendix A: CalEEMod Output

Table of Contents

Westside Industrial Project
Site Preparation Asphalt Removal Calculations

Description	Size	Unit	In Place Compacted Density (ton/CY)	Debris Weight (tons)	C&D Density (tons/CY)	Haul Volume (CY)
Off-Site Pavement[2]	64,445	SF	1.89	2255.6	0.43	5,246

Assume 6 inch of pavement and gravel removed

In-Place Density	lb/ft3	ton/CY
cement	140	1.89

CalRecycle Construction & Demolition (C&D) Density[3]

Concrete	860	lb/CY
	0.43	ton/CY

Notes:
cy = cubic yard
sf = square feet
ft3 = cubic feet

[1] Source: Applicant information

[2] Source: DC Construction Services. 2017. How Thick Is Parking Lot Asphalt? Website: https://dccpaving.com/how-thick-is-parking-lot-asphalt/.

[3] Source: CalRecycle, 2015. 2014 Disposal-Facility-Based Characterization of Solid Waste in California.

Westside Industrial Project
On-Site Paving Haul Trip Calculation

Paved Parking/Truck Yard (acres)	51.7
Paved Parking/Truck Yard (SF)	2,251,850
Asphalt volume (cubic feet) assume 6 inch pavement	1,125,951
Asphalt volume (cy)	41,702
Asphalt Density (ton/cy)	2.025
Asphalt weight (ton)	84,446
Capacity per vendor truck (ton per truck)	18
Asphalt Vendor Deliveries (# of trucks)	4691
Days in paving phase	50
Truck visits per day	94
One-Way Trips per day	**188**

Westside Industrial Project
Off-Site Roadway Paving Haul Trip Calculation

Off-Site Roadway Improvements (acres)	3.55	acres
Roadway Improvements (sf)	154,638	
Asphalt volume (cubic feet) assume 6 inch pa	77,319	
Asphalt volume (cy)	2,864	
Asphalt Density (ton/cy)	2.025	
Asphalt weight (ton)	5,799	
Capacity per vendor truck (ton per truck)	18	
Asphalt Vendor Deliveries (# of trucks)	322	
Days in paving phase	10	
Truck visits per day	32	
One-Way Trips per day	**64**	

Westside Project Specific Exteror and Interior Wall Estimates - Architectural Coating Parameters

	length (ft)	height (ft)	Exterior Area (sqft)	Interior (sq ft)	
East	1150.25	44	50,611	50,611	same as exterior
North	610	44	26,840	26,840	same as exterior
South	560	44	24,640	99,640	(same as exterior PLUS additional 30 interior walls of 100 feet in office complex @ 25 ft high)
West	1150.25	44	50,611	50,611	same as exterior
	Estimate		152,702	227,702	

152,702 1.5

Ratio of Interior to Exterior for Westside Project

	Exterior Sq Ft	Interior Sq Ft
CalEEMod default	**327,135**	**981,405**

= 3 x Interior

3x Interior (75% Interior, 25% Exterior Assumption in CalEEMOD)

	Exterior Sq Ft	Interior Sq Ft
Modeled	**327,135**	**490,702**

= 1.5 x Interior

5.10.2 CalEEMod Output

(Note that both interior and exterior sqft values are still >2 times the estimates for the building)

Westside Industrial Project
Passenger Vehicle Fleet Mix Adjustments

Kern-San Joaquin
2026

	HHDT	LDA	LDT1	LDT2	LHDT1	LHDT2	MCY	MDV	MH	MHDT	OBUS	SBUS	UBUS	**Total**
Default Region Fleet %	3.7%	43.5%	3.7%	21.23414%	3.5%	1.1%	2.1%	19.0%	0.4%	1.6%	0.1%	0.2%	0.0%	**100.0%**

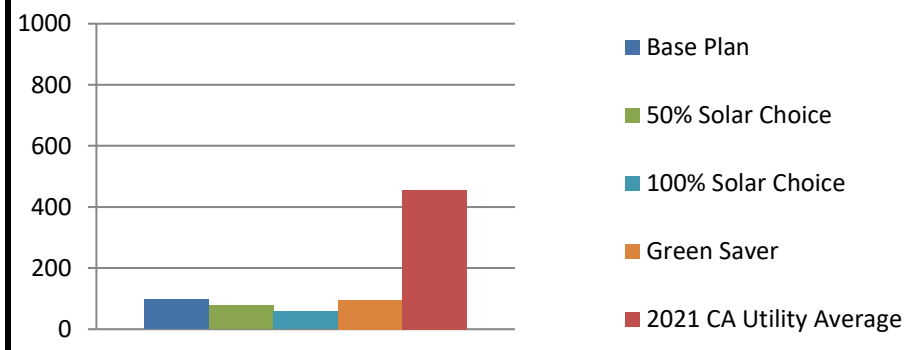
User Defined Industrial Land Use
CALEEMOD Adjustment

Passenger Cars Only	HHDT	LDA	LDT1	LDT2	LHDT1	LHDT2	MCY	MDV	MH	MHDT	OBUS	SBUS	UBUS	TOTAL
Default Light Duty Fleet Mix	0.00%	**49.8%**	**4.2%**	**24.3%**	0.0%	0.0%	0.0%	21.7%	0.0%	0.0%	0.00%	0.00%	0.00%	100%

2021 POWER CONTENT LABEL
Pacific Gas and Electric Company
www.pge.com/billinserts

Greenhouse Gas Emissions Intensity (lbs CO_2e/MWh)

Base Plan	50% Solar Choice	100% Solar Choice	Green Saver	2021 CA Utility Average
98	**78**	**58**	**95**	**456**



Energy Resources	Base Plan	50% Solar Choice	100% Solar Choice	Green Saver	2021 CA Power Mix
Eligible Renewable[1]	**47.7%**	**70.9%**	**93.9%**	**89.9%**	**33.6%**
Biomass & Biowaste	4.2%	2.1%	0.0%	0.0%	2.3%
Geothermal	5.2%	2.6%	0.0%	0.0%	4.8%
Eligible Hydroelectric	1.8%	0.9%	0.0%	0.0%	1.0%
Solar	25.7%	59.8%	93.9%	89.9%	14.2%
Wind	10.9%	5.5%	0.0%	0.0%	11.4%
Coal	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**3.0%**
Large Hydroelectric	**4.0%**	**2.0%**	**0.0%**	**0.0%**	**9.2%**
Natural Gas	**8.9%**	**7.4%**	**0.0%**	**0.0%**	**37.9%**
Nuclear	**39.3%**	**19.7%**	**0.0%**	**0.0%**	**9.3%**
Other	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.2%**
Unspecified Power[2]	**0.0%**	**0.0%**	**6.1%**	**10.1%**	**6.8%**
TOTAL	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**
Percentage of Retail Sales Covered by Retired Unbundled RECs[3]**:**	**4%**	**0%**	**0%**	**0%**	

[1]The eligible renewable percentage above does not reflect RPS compliance, which is determined using a different methodology.

[2]Unspecified power is electricity that has been purchased through open market transactions and is not traceable to a specific generation source.

[3]Renewable energy credits (RECs) are tracking instruments issued for renewable generation. Unbundled renewable energy credits (RECs) represent renewable generation that was not delivered to serve retail sales. Unbundled RECs are not reflected in the power mix or GHG emissions intensities above.

For specific information about this electricity portfolio, contact:	**Pacific Gas and Electric Company** **1-800-743-5000**
For general information about the Power Content Label, visit:	http://www.energy.ca.gov/pcl/
For additional questions, please contact the California Energy Commission at:	Toll-free in California: 844-454-2906 Outside California: 916-653-0237

Westside Industrial Project - Construction Custom Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Westside Industrial Project - Construction
Construction Start Date	9/9/2024
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	18.0
Location	35.234212, -119.037197
County	Kern-San Joaquin
City	Unincorporated
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2891
EDFZ	5
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Southern California Gas
App Version	2022.1.1.20

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

Unrefrigerated Warehouse-No Rail	629	1000sqft	42.0	654,269	1,259,504	0.00	—	Warehouse + Bldgs + Land (minus Parking)
Parking Lot	51.7	Acre	51.7	0.00	0.00	0.00	—	Parking and Paved Areas
Road Construction	0.83	Mile	5.54	0.00	0.00	—	—	—

2. Emissions Summary

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	33.4	28.1	266	268	0.52	11.5	87.0	98.5	10.6	16.9	27.4	—	57,271	57,271	2.32	0.94	24.4	57,491
2025	4.82	88.5	42.4	54.0	0.16	1.23	8.20	9.43	1.15	2.11	3.26	—	25,897	25,897	0.51	2.86	57.8	26,819
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	3.23	2.75	19.8	33.0	0.05	0.66	4.31	4.97	0.61	1.05	1.66	—	9,869	9,869	0.33	0.67	0.63	10,078
2025	3.03	88.5	26.7	31.5	0.11	0.68	4.31	4.89	0.65	1.11	1.76	—	16,056	16,056	0.22	2.20	0.93	16,718
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	3.43	2.89	26.0	29.3	0.05	1.08	7.16	8.24	0.99	1.81	2.80	—	6,797	6,797	0.25	0.23	3.01	6,875
2025	1.76	8.81	12.6	18.7	0.04	0.38	2.68	3.05	0.35	0.67	1.02	—	7,099	7,099	0.13	0.64	7.05	7,299
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.63	0.53	4.74	5.36	0.01	0.20	1.31	1.50	0.18	0.33	0.51	—	1,125	1,125	0.04	0.04	0.50	1,138
2025	0.32	1.61	2.30	3.41	0.01	0.07	0.49	0.56	0.06	0.12	0.19	—	1,175	1,175	0.02	0.11	1.17	1,208

3. Construction Emissions Details

3.1. Site Preparation (2024) - 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	11.9	10.0	98.9	90.5	0.13	4.40	—	4.40	4.05	—	4.05	—	14,563	14,563	0.59	0.12	—	14,613
Dust From Material Movement	—	—	—	—	—	—	21.1	21.1	—	10.8	10.8	—	—	—	—	—	—	—
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	0.65	0.55	5.42	4.96	0.01	0.24	—	0.24	0.22	—	0.22	—	798	798	0.03	0.01	—	801
Dust From Material Movement	—	—	—	—	—	—	1.16	1.16	—	0.59	0.59	—	—	—	—	—	—	—
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	0.99	0.91	< 0.005	0.04	—	0.04	0.04	—	0.04	—	132	132	0.01	< 0.005	—	133

Dust From Material Movement	—	—	—	—	—	—	0.21	0.21	—	0.11	0.11	—	—	—	—	—	—	—
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	0.20	0.19	0.16	2.89	0.00	0.00	0.43	0.43	0.00	0.10	0.10	—	483	483	0.02	0.02	1.87	490
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	0.01	0.01	0.01	0.12	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	24.1	24.1	< 0.005	< 0.005	0.04	24.4
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	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.99	3.99	< 0.005	< 0.005	0.01	4.04
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. Grading (2024) - 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	32.9	27.6	266	260	0.51	11.5	—	11.5	10.6	—	10.6	—	55,748	55,748	2.26	0.45	—	55,939
Dust From Material Movement	—	—	—	—	—	—	26.9	26.9	—	10.7	10.7	—	—	—	—	—	—	—
Onsite truck	0.01	< 0.005	0.20	0.06	< 0.005	< 0.005	58.9	58.9	< 0.005	5.88	5.88	—	145	145	< 0.005	0.02	0.34	152
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.80	1.51	14.6	14.3	0.03	0.63	—	0.63	0.58	—	0.58	—	3,055	3,055	0.12	0.02	—	3,065
Dust From Material Movement	—	—	—	—	—	—	1.48	1.48	—	0.59	0.59	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	3.07	3.07	< 0.005	0.31	0.31	—	7.93	7.93	< 0.005	< 0.005	0.01	8.32
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.33	0.28	2.66	2.60	0.01	0.11	—	0.11	0.11	—	0.11	—	506	506	0.02	< 0.005	—	507
Dust From Material Movement	—	—	—	—	—	—	0.27	0.27	—	0.11	0.11	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.56	0.56	< 0.005	0.06	0.06	—	1.31	1.31	< 0.005	< 0.005	< 0.005	1.38
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.58	0.53	0.46	8.25	0.00	0.00	1.22	1.22	0.00	0.29	0.29	—	1,379	1,379	0.06	0.05	5.35	1,400
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	0.03	0.02	0.03	0.34	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	68.8	68.8	< 0.005	< 0.005	0.13	69.8
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	0.01	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.4	11.4	< 0.005	< 0.005	0.02	11.6
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

3.5. Building Construction (2024) - 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	1.74	1.46	13.7	16.0	0.03	0.61	—	0.61	0.56	—	0.56	—	2,959	2,959	0.12	0.02	—	2,969
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	1.74	1.46	13.7	16.0	0.03	0.61	—	0.61	0.56	—	0.56	—	2,959	2,959	0.12	0.02	—	2,969
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	0.44	0.37	3.43	4.01	0.01	0.15	—	0.15	0.14	—	0.14	—	741	741	0.03	0.01	—	744
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	0.08	0.07	0.63	0.73	< 0.005	0.03	—	0.03	0.03	—	0.03	—	123	123	< 0.005	< 0.005	—	123
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	1.59	1.46	1.26	22.7	0.00	0.00	3.36	3.36	0.00	0.79	0.79	—	3,790	3,790	0.15	0.13	14.7	3,847
Vendor	0.18	0.11	4.18	1.41	0.03	0.05	0.95	1.00	0.05	0.26	0.31	—	3,585	3,585	0.04	0.52	9.75	3,750
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	1.32	1.18	1.61	15.5	0.00	0.00	3.36	3.36	0.00	0.79	0.79	—	3,322	3,322	0.18	0.13	0.38	3,365
Vendor	0.17	0.10	4.47	1.43	0.03	0.05	0.95	1.00	0.05	0.26	0.31	—	3,588	3,588	0.04	0.52	0.25	3,744
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	0.34	0.30	0.37	4.22	0.00	0.00	0.83	0.83	0.00	0.19	0.19	—	865	865	0.04	0.03	1.59	877
Vendor	0.04	0.03	1.10	0.36	0.01	0.01	0.24	0.25	0.01	0.07	0.08	—	898	898	0.01	0.13	1.05	938
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	0.06	0.06	0.07	0.77	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	143	143	0.01	0.01	0.26	145
Vendor	0.01	< 0.005	0.20	0.07	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.01	—	149	149	< 0.005	0.02	0.17	155
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.63	1.37	12.7	15.9	0.03	0.52	—	0.52	0.48	—	0.48	—	2,959	2,959	0.12	0.02	—	2,969
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	1.63	1.37	12.7	15.9	0.03	0.52	—	0.52	0.48	—	0.48	—	2,959	2,959	0.12	0.02	—	2,969
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	0.81	0.68	6.35	7.94	0.01	0.26	—	0.26	0.24	—	0.24	—	1,477	1,477	0.06	0.01	—	1,482

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	0.15	0.12	1.16	1.45	< 0.005	0.05	—	0.05	0.04	—	0.04	—	244	244	0.01	< 0.005	—	245
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	1.40	1.28	1.14	20.7	0.00	0.00	3.36	3.36	0.00	0.79	0.79	—	3,706	3,706	0.15	0.13	13.3	3,762
Vendor	0.15	0.11	4.00	1.32	0.03	0.05	0.95	1.00	0.05	0.26	0.31	—	3,519	3,519	0.04	0.52	9.68	3,684
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	1.25	1.12	1.39	14.2	0.00	0.00	3.36	3.36	0.00	0.79	0.79	—	3,250	3,250	0.07	0.13	0.34	3,291
Vendor	0.14	0.10	4.29	1.35	0.03	0.05	0.95	1.00	0.05	0.26	0.31	—	3,522	3,522	0.04	0.52	0.25	3,678
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	0.63	0.57	0.63	7.72	0.00	0.00	1.66	1.66	0.00	0.39	0.39	—	1,685	1,685	0.03	0.06	2.86	1,708
Vendor	0.07	0.05	2.10	0.67	0.01	0.03	0.47	0.50	0.03	0.13	0.16	—	1,756	1,756	0.02	0.26	2.09	1,836
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	0.12	0.10	0.11	1.41	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	279	279	< 0.005	0.01	0.47	283
Vendor	0.01	0.01	0.38	0.12	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	291	291	< 0.005	0.04	0.35	304
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving On-Site (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	1.07	0.90	8.39	11.2	0.02	0.39	—	0.39	0.36	—	0.36	—	1,700	1,700	0.07	0.01	—	1,706
Paving	—	3.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	1.07	0.90	8.39	11.2	0.02	0.39	—	0.39	0.36	—	0.36	—	1,700	1,700	0.07	0.01	—	1,706
Paving	—	3.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.15	0.12	1.15	1.54	< 0.005	0.05	—	0.05	0.05	—	0.05	—	233	233	0.01	< 0.005	—	234
Paving	—	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.03	0.02	0.21	0.28	< 0.005	0.01	—	0.01	0.01	—	0.01	—	38.6	38.6	< 0.005	< 0.005	—	38.7
Paving	—	0.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.06	1.13	0.00	0.00	0.18	0.18	0.00	0.04	0.04	—	202	202	0.01	0.01	0.73	205
Vendor	0.04	0.03	0.93	0.31	0.01	0.01	0.22	0.23	0.01	0.06	0.07	—	820	820	0.01	0.12	2.26	859
Hauling	0.45	0.24	15.1	3.34	0.09	0.25	3.49	3.73	0.25	0.95	1.20	—	12,990	12,990	0.11	2.04	31.9	13,633
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.08	0.78	0.00	0.00	0.18	0.18	0.00	0.04	0.04	—	177	177	< 0.005	0.01	0.02	180
Vendor	0.03	0.02	1.00	0.31	0.01	0.01	0.22	0.23	0.01	0.06	0.07	—	821	821	0.01	0.12	0.06	857
Hauling	0.43	0.22	16.3	3.42	0.09	0.25	3.49	3.73	0.25	0.95	1.20	—	12,999	12,999	0.11	2.05	0.83	13,613
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.12	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	25.2	25.2	< 0.005	< 0.005	0.04	25.6
Vendor	< 0.005	< 0.005	0.13	0.04	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	112	112	< 0.005	0.02	0.13	118
Hauling	0.06	0.03	2.18	0.46	0.01	0.03	0.47	0.51	0.03	0.13	0.16	—	1,780	1,780	0.02	0.28	1.88	1,866
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.18	4.18	< 0.005	< 0.005	0.01	4.24
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	18.6	18.6	< 0.005	< 0.005	0.02	19.5
Hauling	0.01	0.01	0.40	0.08	< 0.005	0.01	0.09	0.09	0.01	0.02	0.03	—	295	295	< 0.005	0.05	0.31	309

3.11. Architectural Coating (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	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	84.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	84.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.0	11.0	< 0.005	< 0.005	—	11.0
Architectural Coatings	—	6.91	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.82	1.82	< 0.005	< 0.005	—	1.82
Architectural Coatings	—	1.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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	0.10	0.09	0.08	1.43	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	256	256	0.01	0.01	0.92	260
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.10	0.98	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	225	225	< 0.005	0.01	0.02	228
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	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	19.2	19.2	< 0.005	< 0.005	0.03	19.4
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	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.18	3.18	< 0.005	< 0.005	0.01	3.22
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

3.13. Off-Site Prep (2024) - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.10	2.61	23.0	24.3	0.04	1.10	—	1.10	1.02	—	1.02	—	4,601	4,601	0.19	0.04	—	4,617
Dust From Material Movement	—	—	—	—	—	—	0.84	0.84	—	0.09	0.09	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.08	0.05	< 0.005	< 0.005	8.83	8.83	< 0.005	0.88	0.88	—	28.0	28.0	< 0.005	< 0.005	0.05	29.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.07	0.63	0.67	< 0.005	0.03	—	0.03	0.03	—	0.03	—	126	126	0.01	< 0.005	—	126
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.23	0.23	< 0.005	0.02	0.02	—	0.77	0.77	< 0.005	< 0.005	< 0.005	0.81
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	20.9	20.9	< 0.005	< 0.005	—	20.9
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.04	0.04	< 0.005	< 0.005	< 0.005	—	0.13	0.13	< 0.005	< 0.005	< 0.005	0.13
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.17	0.16	0.14	2.47	0.00	0.00	0.37	0.37	0.00	0.09	0.09	—	414	414	0.02	0.01	1.61	420
Vendor	< 0.005	< 0.005	0.04	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	33.4	33.4	< 0.005	< 0.005	0.09	35.0
Hauling	0.16	0.08	5.46	1.20	0.03	0.09	1.22	1.30	0.09	0.33	0.42	—	4,621	4,621	0.04	0.74	11.3	4,854
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.3	10.3	< 0.005	< 0.005	0.02	10.5
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.92	0.92	< 0.005	< 0.005	< 0.005	0.96
Hauling	< 0.005	< 0.005	0.16	0.03	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	127	127	< 0.005	0.02	0.13	133
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.71	1.71	< 0.005	< 0.005	< 0.005	1.73
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.15	0.15	< 0.005	< 0.005	< 0.005	0.16
Hauling	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	21.0	21.0	< 0.005	< 0.005	0.02	22.0

3.15. Paving Off-Site (2024) - 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	1.14	0.96	8.15	10.9	0.01	0.39	—	0.39	0.36	—	0.36	—	1,620	1,620	0.07	0.01	—	1,626
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	0.03	0.03	0.22	0.30	< 0.005	0.01	—	0.01	0.01	—	0.01	—	44.4	44.4	< 0.005	< 0.005	—	44.5
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	< 0.005	0.04	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.35	7.35	< 0.005	< 0.005	—	7.37
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	0.12	0.11	0.09	1.65	0.00	0.00	0.24	0.24	0.00	0.06	0.06	—	276	276	0.01	0.01	1.07	280
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	0.03	0.02	1.00	0.22	0.01	0.02	0.22	0.24	0.02	0.06	0.08	—	845	845	0.01	0.14	2.06	888
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	—	6.88	6.88	< 0.005	< 0.005	0.01	6.98
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	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	23.2	23.2	< 0.005	< 0.005	0.02	24.3
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.14	1.14	< 0.005	< 0.005	< 0.005	1.16
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	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.84	3.84	< 0.005	< 0.005	< 0.005	4.02

4. Operations Emissions Details

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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	7/1/2024	7/26/2024	5.00	20.0	—
Grading	Grading	7/29/2024	8/23/2024	5.00	20.0	—
Building Construction	Building Construction	8/26/2024	9/12/2025	5.00	275	—
Paving On-Site	Paving	8/18/2025	10/24/2025	5.00	50.0	—
Architectural Coating	Architectural Coating	9/15/2025	10/24/2025	5.00	30.0	—
Off-Site Prep	Linear, Grading & Excavation	7/1/2024	7/12/2024	5.00	10.0	Pavement Removal
Paving Off-Site	Linear, Paving	7/15/2024	7/26/2024	5.00	10.0	—

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
Site Preparation	Rubber Tired Dozers	Diesel	Average	6.00	11.0	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	8.00	11.0	84.0	0.37
Grading	Excavators	Diesel	Average	10.0	12.0	158	0.38
Grading	Graders	Diesel	Average	5.00	12.0	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	5.00	12.0	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	10.0	12.0	84.0	0.37
Grading	Scrapers	Diesel	Average	10.0	12.0	423	0.48
Building Construction	Cranes	Diesel	Average	1.00	9.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	9.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	9.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	9.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	9.00	46.0	0.45
Paving On-Site	Pavers	Diesel	Average	2.00	9.00	81.0	0.42
Paving On-Site	Paving Equipment	Diesel	Average	2.00	9.00	89.0	0.36
Paving On-Site	Rollers	Diesel	Average	2.00	9.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Off-Site Prep	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Off-Site Prep	Crawler Tractors	Diesel	Average	1.00	8.00	87.0	0.43
Off-Site Prep	Graders	Diesel	Average	1.00	8.00	148	0.41
Off-Site Prep	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Off-Site Prep	Signal Boards	Electric	Average	1.00	8.00	6.00	0.82

Off-Site Prep	Tractors/Loaders/Backh	Diesel	Average	2.00	8.00	84.0	0.37
Off-Site Prep	Rubber Tired Loaders	Diesel	Average	1.00	8.00	150	0.36
Off-Site Prep	Scrapers	Diesel	Average	1.00	8.00	423	0.48
Paving Off-Site	Rollers	Diesel	Average	3.00	8.00	36.0	0.38
Paving Off-Site	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Paving Off-Site	Pavers	Diesel	Average	1.00	8.00	81.0	0.42
Paving Off-Site	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Paving Off-Site	Signal Boards	Electric	Average	1.00	8.00	6.00	0.82

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	35.0	17.3	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.6	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	100	17.3	LDA,LDT1,LDT2
Grading	Vendor	—	10.6	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	4.00	10.0	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	275	17.3	LDA,LDT1,LDT2
Building Construction	Vendor	107	10.6	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT

Building Construction	Onsite truck	—	—	HHDT
Paving On-Site	—	—	—	—
Paving On-Site	Worker	15.0	17.3	LDA,LDT1,LDT2
Paving On-Site	Vendor	25.0	10.6	HHDT,MHDT
Paving On-Site	Hauling	188	20.0	HHDT
Paving On-Site	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	19.0	17.3	LDA,LDT1,LDT2
Architectural Coating	Vendor	0.00	10.6	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Off-Site Prep	—	—	—	—
Off-Site Prep	Worker	30.0	17.3	LDA,LDT1,LDT2
Off-Site Prep	Vendor	1.00	10.6	HHDT,MHDT
Off-Site Prep	Hauling	65.6	20.0	HHDT
Off-Site Prep	Onsite truck	4.00	1.50	HHDT
Paving Off-Site	—	—	—	—
Paving Off-Site	Worker	20.0	17.3	LDA,LDT1,LDT2
Paving Off-Site	Vendor	0.00	10.6	HHDT,MHDT
Paving Off-Site	Hauling	12.0	20.0	HHDT
Paving Off-Site	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	490,702	327,135	135,123

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	0.00	0.00	90.0	0.00	—
Grading	0.00	0.00	180	0.00	—
Paving On-Site	0.00	0.00	0.00	0.00	57.2
Off-Site Prep	0.00	5,246	5.54	0.00	—

5.6.2. Construction Earthmoving Control Strategies

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

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Unrefrigerated Warehouse-No Rail	0.00	0%
Parking Lot	51.7	100%
Road Construction	5.54	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
2024	58.7	204	0.03	< 0.005

8. User Changes to Default Data

Screen	Justification
Land Use	The land use summary is based on site plan and applicant-provided information.
Construction: Construction Phases	No demolition is needed. CalEEMod Defaults. Construction includes off-site dedication area construction for roadways/sidewalks.
Construction: Trips and VMT	On and Off-Site Haul Trips for Delivery of Aspahlt are calculated based on 12 inch (base + paving) of asphalt. On-Site Water Truck Trips added for on and Off-Site Grading- assuming 30 ft watering width and watering twice per day.
Construction: Architectural Coatings	Proposed warehouse construction exterior coating. Few interior walls, thus have an interior factor of 1.5 to exterior walls.
Construction: Paving	The paved area is based on land use summary.
Operations: Architectural Coatings	Based on applicant-provided information, the interior painting is not needed.
Construction: Dust From Material Movement	Off-Site Improvement Removal of 64,445 SF of pavement, calculated as 5246 CY.
Construction: Off-Road Equipment	Equipment number and hours per day to adjust for scheduling differences from CalEEMod defaults to preserve hp-hrs of operation. Only 1 Scraper assigned to 0.83 miles of off-site roadway improvements.
Characteristics: Utility Information	2021 Power Content Label - PG&E Base Plan

Westside Industrial Project - Operations 2026 Custom Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Westside Industrial Project - Operations 2026
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	18.0
Location	35.234212, -119.037197
County	Kern-San Joaquin
City	Unincorporated
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2891
EDFZ	5
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Southern California Gas
App Version	2022.1.1.21

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
Unrefrigerated Warehouse-No Rail	629	1000sqft	42.0	653,442	1,194,114	976,615	—	Warehouse + All Land Except Parking

User Defined Industrial	629	User Defined Unit	0.00	0.00	0.00	0.00	—	Parking/Truck Yard
Parking Lot	2,252	1000sqft	51.7	0.00	0.00	0.00	—	Parking/Truck Yard
Industrial Park	0.83	1000sqft	0.00	827	0.00	0.00	—	Guard House/Pump House

2. Emissions Summary

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	10.8	48.7	161	0.79	0.91	48.8	49.7	0.87	12.5	13.3	81,705	1.19	7.22	84,113
Area	19.5	0.24	28.5	< 0.005	0.05	—	0.05	0.04	—	0.04	117	< 0.005	< 0.005	117
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	2,419	0.00	0.00	2,419
Water	—	—	—	—	—	—	—	—	—	—	458	28.6	0.68	1,375
Waste	—	—	—	—	—	—	—	—	—	—	319	31.9	0.00	1,115
Total	30.4	48.9	189	0.79	0.96	48.8	49.7	0.91	12.5	13.4	85,018	61.6	7.90	89,140
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	9.82	53.6	115	0.74	0.91	48.8	49.7	0.87	12.5	13.3	76,894	1.34	7.35	79,125
Area	14.9	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	2,419	0.00	0.00	2,419
Water	—	—	—	—	—	—	—	—	—	—	458	28.6	0.68	1,375
Waste	—	—	—	—	—	—	—	—	—	—	319	31.9	0.00	1,115
Total	24.7	53.6	115	0.74	0.91	48.8	49.7	0.87	12.5	13.3	80,090	61.8	8.03	84,034

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	9.87	51.7	123	0.75	0.91	48.2	49.1	0.87	12.3	13.2	78,228	1.25	7.28	80,528
Area	17.2	0.12	14.0	< 0.005	0.02	—	0.02	0.02	—	0.02	57.7	< 0.005	< 0.005	57.9
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	2,419	0.00	0.00	2,419
Water	—	—	—	—	—	—	—	—	—	—	458	28.6	0.68	1,375
Waste	—	—	—	—	—	—	—	—	—	—	319	31.9	0.00	1,115
Total	27.0	51.8	137	0.75	0.94	48.2	49.2	0.89	12.3	13.2	81,482	61.7	7.96	85,495
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.80	9.43	22.4	0.14	0.17	8.80	8.97	0.16	2.25	2.41	12,952	0.21	1.21	13,332
Area	3.13	0.02	2.56	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	9.55	< 0.005	< 0.005	9.59
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	401	0.00	0.00	401
Water	—	—	—	—	—	—	—	—	—	—	75.8	4.73	0.11	228
Waste	—	—	—	—	—	—	—	—	—	—	52.8	5.27	0.00	185
Total	4.93	9.45	25.0	0.14	0.17	8.80	8.97	0.16	2.25	2.41	13,490	10.2	1.32	14,155

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

Unrefrigerated Warehouse-No Rail	10.4	7.94	155	0.41	0.16	37.7	37.9	0.14	9.50	9.64	41,392	0.83	0.85	41,798
User Defined Industrial	0.47	40.7	5.16	0.38	0.76	11.1	11.8	0.72	2.97	3.69	40,312	0.36	6.36	42,315
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
Industrial Park	0.00	0.00	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	10.8	48.7	161	0.79	0.91	48.8	49.7	0.87	12.5	13.3	81,705	1.19	7.22	84,113
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	9.36	9.86	110	0.36	0.16	37.7	37.9	0.14	9.50	9.64	36,574	0.97	0.99	36,897
User Defined Industrial	0.46	43.7	5.22	0.38	0.76	11.1	11.8	0.72	2.97	3.69	40,320	0.36	6.36	42,228
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
Industrial Park	0.00	0.00	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	9.82	53.6	115	0.74	0.91	48.8	49.7	0.87	12.5	13.3	76,894	1.34	7.35	79,125
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	1.72	1.61	21.5	0.07	0.03	6.80	6.83	0.03	1.71	1.74	6,277	0.15	0.15	6,335
User Defined Industrial	0.08	7.82	0.95	0.07	0.14	2.00	2.14	0.13	0.54	0.67	6,675	0.06	1.05	6,997

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
Industrial Park	0.00	0.00	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	1.80	9.43	22.4	0.14	0.17	8.80	8.97	0.16	2.25	2.41	12,952	0.21	1.21	13,332

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	1,884	0.00	0.00	1,884
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	530	0.00	0.00	530
Industrial Park	—	—	—	—	—	—	—	—	—	—	5.21	0.00	0.00	5.21
Total	—	—	—	—	—	—	—	—	—	—	2,419	0.00	0.00	2,419
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	1,884	0.00	0.00	1,884

User Defined Industrial	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	530	0.00	0.00	530
Industrial Park	—	—	—	—	—	—	—	—	—	—	5.21	0.00	0.00	5.21
Total	—	—	—	—	—	—	—	—	—	—	2,419	0.00	0.00	2,419
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	312	0.00	0.00	312
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	87.7	0.00	0.00	87.7
Industrial Park	—	—	—	—	—	—	—	—	—	—	0.86	0.00	0.00	0.86
Total	—	—	—	—	—	—	—	—	—	—	401	0.00	0.00	401

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

User Defined Industrial	0.00	0.00	0.00	0.00	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	0.00	0.00	0.00	0.00
Industrial Park	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	0.00	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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	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	0.00	0.00	0.00	0.00
Industrial Park	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	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	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	0.00	0.00	0.00	0.00
Industrial Park	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	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	14.2	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.69	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	4.67	0.24	28.5	< 0.005	0.05	—	0.05	0.04	—	0.04	117	< 0.005	< 0.005	117
Total	19.5	0.24	28.5	< 0.005	0.05	—	0.05	0.04	—	0.04	117	< 0.005	< 0.005	117
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	14.2	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.69	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	14.9	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	2.59	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.42	0.02	2.56	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	9.55	< 0.005	< 0.005	9.59

Total	3.13	0.02	2.56	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	9.55	< 0.005	< 0.005	9.59

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	458	28.6	0.68	1,375
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Industrial Park	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	458	28.6	0.68	1,375
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	458	28.6	0.68	1,375
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00

Industrial Park	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	458	28.6	0.68	1,375
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	75.8	4.73	0.11	228
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Industrial Park	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	75.8	4.73	0.11	228

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	319	31.9	0.00	1,115
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00

Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Industrial Park	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	319	31.9	0.00	1,115
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	319	31.9	0.00	1,115
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Industrial Park	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	319	31.9	0.00	1,115
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	52.8	5.27	0.00	185
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Industrial Park	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	52.8	5.27	0.00	185

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

5. Activity Data

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
Unrefrigerated Warehouse-No Rail	3,907	3,907	3,907	1,426,144	54,292	54,292	54,292	19,816,427
User Defined Industrial	145	145	145	52,820	12,156	12,156	12,156	4,436,894
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Industrial Park	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	490,702	327,135	135,112

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)
Unrefrigerated Warehouse-No Rail	7,017,846	98.0	0.0000	0.0000	0.00
User Defined Industrial	0.00	98.0	0.0000	0.0000	0.00
Parking Lot	1,972,629	98.0	0.0000	0.0000	0.00
Industrial Park	19,390	98.0	0.0000	0.0000	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-No Rail	145,499,263	38,943,475
User Defined Industrial	0.00	0.00
Parking Lot	0.00	0.00
Industrial Park	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Unrefrigerated Warehouse-No Rail	591	—
User Defined Industrial	0.00	—
Parking Lot	0.00	—
Industrial Park	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

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

8. User Changes to Default Data

Screen	Justification
Land Use	The land use summary is based on site plan and applicant-provided information. Total 93.74 acres. Does not include the Off-Site Improvements.
Construction: Construction Phases	No demolition is needed. CalEEMod Defaults. Construction includes off-site dedication area construction.
Construction: Trips and VMT	Paving Phase's Vendor Trips are calculated based on 12 inch (base + paving) of asphalt.
Construction: Architectural Coatings	Based on applicant-provided information
Construction: Paving	The paved area is based on land use summary.
Operations: Architectural Coatings	Interior Architectural Requirements adjusted for warehouse, accounting for interior walls for breakrooms, restrooms, mechanical rooms
Operations: Vehicle Data	Trip Rates based on Traffic Study ITE Trip Rates Land Use 155 (High Cube Fulfillment Warehouse) Trip Length for Passenger Trips - Default Trip Length for Trucks based based on Kern County Logisitics
Operations: Fleet Mix	Passenger Car amd Truck Fleet mix
Operations: Energy Use	All-Electric Buildings, Natural Gas = 0
Operations: Water and Waste Water	No water usage at pump/guard house
Operations: Solid Waste	No Waste generation at pump/guard house
Operations: Refrigerants	Refrigerant emissions not calculated.
Characteristics: Utility Information	2021 Power Content - PG&E Base Plan

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

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

8. User Changes to Default Data

Screen	Justification
Land Use	The land use summary is based on site plan and applicant-provided information. Total 93.74 acres. Does not include the Off-Site Improvements.
Construction: Construction Phases	No demolition is needed. CalEEMod Defaults. Construction includes off-site dedication area construction.
Construction: Trips and VMT	Paving Phase's Vendor Trips are calculated based on 12 inch (base + paving) of asphalt.
Construction: Architectural Coatings	Based on applicant-provided information
Construction: Paving	The paved area is based on land use summary.
Operations: Architectural Coatings	Interior Architectural Requirements adjusted for warehouse, accounting for interior walls for breakrooms, restrooms, mechanical rooms
Operations: Vehicle Data	Trip Rates based on Traffic Study ITE Trip Rates Land Use 155 (High Cube Fulfillment Warehouse)
Operations: Fleet Mix	Passenger Car amd Truck Fleet mix
Operations: Energy Use	All-Electric Buildings, Natural Gas = 0
Operations: Water and Waste Water	No water usage at pump/guard house
Operations: Solid Waste	No Waste generation at pump/guard house
Operations: Refrigerants	Refrigerant emissions not calculated.

Characteristics: Utility Information	2021 Power Content - PG&E Base Plan

Westside Industrial Project
Local On-Site and Vicinity Emissions (including emissions within 1/4 mile of site boundary)
For Ambient Air Quality Applicability Analysis (AAQA) Determination Under CEQA

Operations - Maximum Daily Localized Emissions (lb/day)

On-Site and Local Mobile Source Emissions		One-Way Trips/day	Round-Trips (Daily Truck Visits)	Process	Quantity per Vehicle Visit (RT)	Daily Quantity	ROG	NOx	PM10	PM2_5	PM10_DUST	PM2.5_DUST	CO
On-Site Start & Evaporative	Cars	3,907	1,954	Starts/Trips	1	1,953.5	9.6569	1.5637	0.0171	0.0157	-	-	63.1175
On-Site Running (includes idle)	Cars	3,907	1,954	Car Miles/day	1.85	3,614.0	0.4662	0.9474	0.0534	0.0491	2.3941	0.5985	22.0674
Off-Site Local (within 1/4 mile)	Cars	3,907	1,954	Car Miles/day	0.72	1,398.7	0.1139	0.3069	0.0130	0.0120	0.9151	0.2288	7.4384
On-Site Start	Trucks	145	73	Starts	1	72.5	-	1.3192	-	-	-	-	-
On-Site Idle	Trucks	145	73	Idle-hours/day	0.33	24.2	0.1337	1.5357	0.0007	0.0006	-	-	1.8921
On-Site Running	Trucks	145	73	Truck Miles/day	2.4	174.0	0.0456	4.3188	0.0044	0.0042	0.1153	0.0288	0.4073
Off-Site Local (within 1/4 mile)	**Trucks**	145	73	Truck Miles/day	0.5	36.3	0.0006	0.0006	0.0006	0.0006	0.0237	0.0059	0.0006
						Totals	10.4	10.0	0.1	0.1	3.448	0.862	94.9

Operations - Average Daily Localized Emissions (lb/day)

On-Site and Local Mobile Source Emissions		One-Way Trips/day	Round-Trips (Daily Truck Visits)	Process	Quantity per Vehicle Visit (RT)	Daily Quantity	ROG	NOx	PM10	PM2_5	PM10_DUST	PM2.5_DUST	CO
On-Site Start & Evaporative	Cars	3,907	1,954	Starts/Trips	1	1954	5.8912	1.1956	0.0171	0.0157	-	-	17.9999
On-Site Running (includes idle)	Cars	3,907	1,954	Car Miles/day	1.85	3614	0.4688	0.6064	0.0563	0.0518	2.3941	0.5985	13.6056
Off-Site Local (within 1/4 mile)	Cars	3,907	1,954	Car Miles/day	0.72	1399	0.1146	0.1964	0.0137	0.0126	0.9151	0.2288	4.5776
On-Site Start	Trucks	145	73	Starts	1	73	-	1.3192	-	-	-	-	-
On-Site Idle	Trucks	145	73	Idle-hours/day	0.33	24	0.1262	1.4389	0.0006	0.0006	-	-	1.8580
On-Site Running	Trucks	145	73	Truck Miles/day	2.4	174	0.0456	3.8054	0.0044	0.0042	0.1153	0.0288	0.4073
Off-Site Local (within 1/4 mile)	**Trucks**	145	73	Truck Miles/day	0.5	36	0.0040	0.4436	0.0006	0.0006	0.0237	0.0059	0.0401
						Totals	6.7	9.0	0.1	0.1	3.448	0.862	38.5

truck on-site driving @ speeds of <5 mph.

car on-site driving @ speeds of <10 mph

Passenger vehicle emissions include cold start emissions, hot soak, and diurnal emissions based on 9 hour on-site time and running loss emissions for 10 minute driving time on-site.

Assume trucks idle up to 20 **minute** on site which includes idle at idle at entrance/exit, and on entrance and exit to dock and entrance/exit to parking

Assume truck speed off-site as an aggregate of emissions from 0-25 miles per hour, ALL trucks go East to SR-99.

EMFAC2021 v1.02 Emission Factors - Project Level for Cars and Trucks (2026 First Year of Full Operation)

Vehicle	Season	Process	Units	ROG	NOx	PM10	PM2_5	PM10_DUST	PM2.5_DUST	CO
Car	Annual	Start/Evap(on-site)	g/start or g/trip	1.368	0.278	0.004	0.004	-	-	4.18
Car	Summer	Start/Evap(on-site)	g/start or g/trip	1.726	0.284	0.004	0.004	-	-	5.05
Car	Winter	Start/Evap(on-site)	g/start or g/trip	2.242	0.363	0.004	0.004	-	-	14.66
Car	Annual	Running (on-site)	g/mi	0.059	0.076	0.007	0.007	0.297	0.074	1.71
Car	Summer	Running (on-site)	g/mi	0.059	0.050	0.007	0.006	0.300	0.075	2.77
Car	Winter	Running (on-site)	g/mi	0.048	0.119	0.007	0.006	0.300	0.075	1.35
Car	Annual	Running (off-site)	g/mi	0.037	0.064	0.004	0.004	0.297	0.074	1.48
Car	Summer	Running (off-site)	g/mi	0.037	0.042	0.004	0.004	0.300	0.075	2.41
Car	Winter	Running (off-site)	g/mi	0.030	0.100	0.004	0.004	0.300	0.075	1.17
Truck	Annual	Start (on-site)	g/start	-	8.253	-	-	-	-	-
Truck	Summer	Start (on-site)	g/start	-	8.253	-	-	-	-	-
Truck	Winter	Start (on-site)	g/start	-	8.253	-	-	-	-	-
Truck	Annual	Idle (on-site)	g/idle-hour	2.369	27.007	0.011	0.010	-	-	34.87
Truck	Summer	Idle (on-site)	g/idle-hour	2.509	25.692	0.010	0.009	-	-	34.41
Truck	Winter	Idle (on-site)	g/idle-hour	2.175	28.824	0.013	0.012	-	-	35.51
Truck	Annual	Running (on-site)	g/mi	0.119	9.920	0.011	0.011	0.297	0.074	1.06
Truck	Summer	Running (on-site)	g/mi	0.119	7.930	0.011	0.011	0.300	0.075	1.06
Truck	Winter	Running (on-site)	g/mi	0.119	11.258	0.011	0.011	0.300	0.075	1.06
Truck	Annual	Running (off-site)	g/mi	0.051	5.550	0.008	0.008	0.297	0.074	0.50
Truck	Summer	Running (off-site)	g/mi	0.051	5.550	0.008	0.008	0.300	0.075	0.50
Truck	Winter	Running (off-site)	g/mi	0.051	5.550	0.008	0.008	0.300	0.075	0.50

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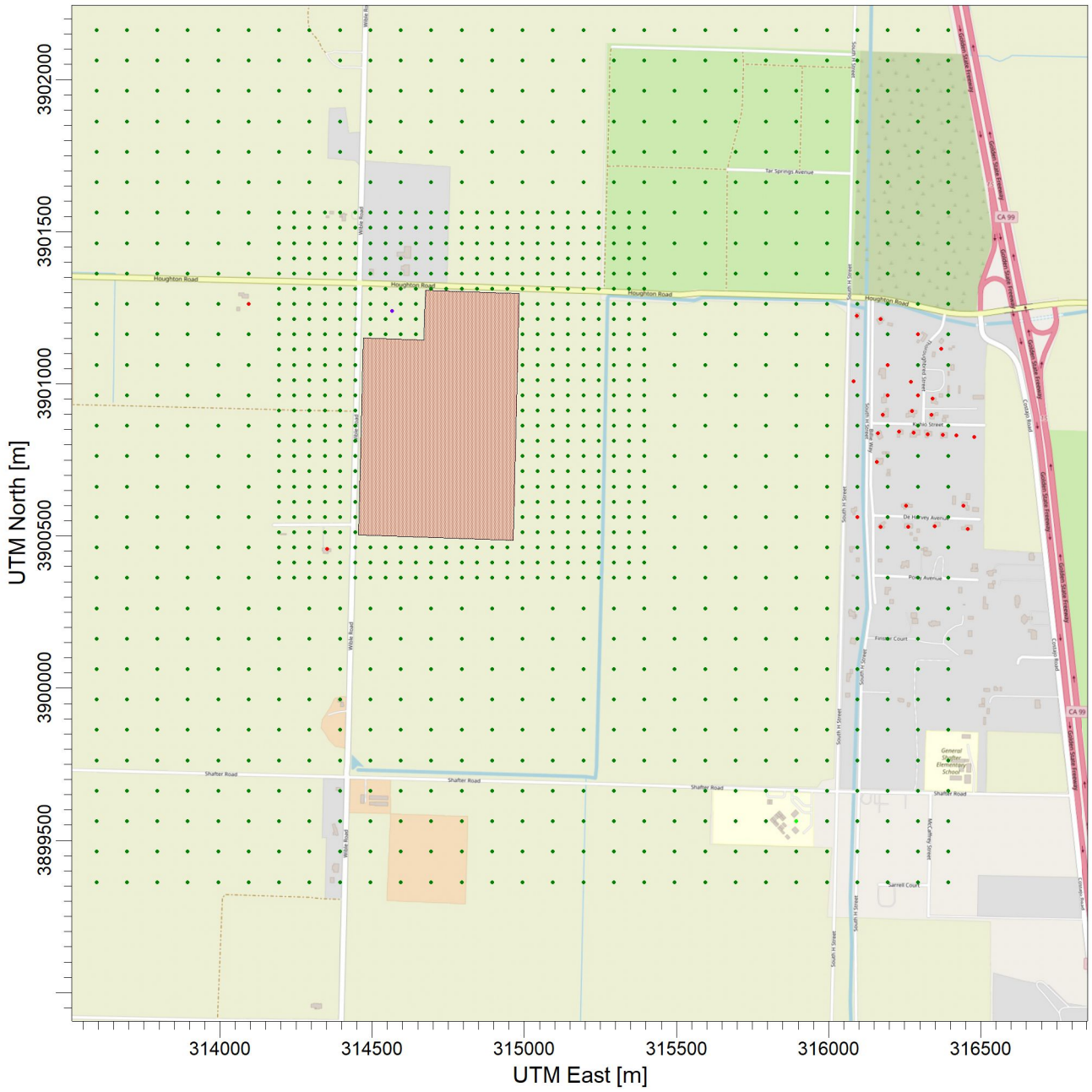
Appendix B: Health Risk Assessment Supporting Information

Table of Contents

PROJECT TITLE:

Westside Industrial Project
Receptor Set-Up



COMMENTS:	SOURCES: **31**	COMPANY NAME:	
	RECEPTORS: **1422**	MODELER:	
		SCALE: 1:21,000 0 0.5 km	
		DATE: **11/8/2023**	PROJECT NO.:

Westside Industrial Project
Modeling Parameters for Construction HRA

Phase	Source	Description	Source Type	Size	Units	Release Height (m)	Source Width (m)	Initial Lateral Dimension (m)	Initial Vertical Dimension (m)
Construction	Off-Road Construction Equipment[1]	Construction Site	Area	380850	m2	5	—	—	1.4
Construction	On-Road Construction Trucks[2]	Houghton Road to SR-99	Line-Volume	1676	meters	3.26		7.44	3.04

1 Construction exhaust modeled as an area source. Release parameters for construction equipment exhaust modeling from SCAQMD (2008) for gaseous exhaust from construction equipment.

2 On-Road construction trucks are Vendor and Haul Trucks, as estimated in CalEEMod.

Trucks were modeled as adjacent volume sources following US EPA Haul Road Guidance. Roadway width -= physical width plus 3 meters on each side for mixing., Truck Height = 12.6 ft or 3.84 meters

Haul Road Calculator is based on the US EPA Haul Road Workgroup Final Report released on March 2, 2012 which suggests the use of Adjacent Volume Sources to represent the haul road.

Trucks height 12.6 feet = 3.84 meters, Release Height = 1/2 Plume Height, Sigmaz = Release Height/2.15

Control Pathway

Dispersion Options

Titles

F:\Jobs\41150044HZ\ConHRA\ConHRA.isc

Dispersion Options

☑ Regulatory Default ☐ Non-Default Options

Dispersion Coefficient

Rural

Output Type

☑ Concentration
☐ Total Deposition (Dry & Wet)
☐ Dry Deposition
☐ Wet Deposition

Plume Depletion

☐ Dry Removal
☐ Wet Removal

Output Warnings

☐ No Output Warnings
☐ Non-fatal Warnings for Non-sequential Met Data

Pollutant / Averaging Time / Terrain Options

Pollutant Type

SO2

Averaging Time Options

Hours ☑ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 6 ☐ 8 ☐ 12 ☐ 24

☐ Month ☑ Period ☐ Annual

☐ 1-Hour SO2 Non-NAAQS
☑ 1-Hour SO2 NAAQS

Exponential Decay

Option not available

Terrain Height Options

☐ Flat ☑ Elevated

SO: Meters
RE: Meters
TG: Meters

Flagpole Receptors

☐ Yes ☑ No

Default Height = 0.00 m

Control Pathway

Optional Files

Re-Start File	Init File	Multi-Year Analyses	Event Input File	Error Listing File
☐	☐	☐	☐	■

Detailed Error Listing File

Filename: ConHRA.err

Source Pathway - Source Inputs

Polygon Area Sources

Source Type: AREA POLY

Source: SITE (Construction Site)

Base Elevation (Optional)	Release Height [m]	Emission Rate [g/ (s-m^2)]	Initial Vertical Dim. [m]	Number of Vertices (or sides)	X Coordinate for Vertices [m]	Y Coordinate for Vertices [m]
101.52	5.00	2.63E-6	1.40	7	314474.90	3901152.23
		2.63E-6			314670.37	3901146.53
		2.63E-6			314674.93	3901306.00
		2.63E-6			314843.17	3901300.82
		2.63E-6			314981.60	3901298.35
		2.63E-6			314966.42	3900484.23
		2.63E-6			314452.13	3900503.20

Line Volume Sources

Source Type: LINE VOLUME

Source: HAULROAD (Construction truck trip route.)

Length of Side [m]	Emission Rate [g/ s]	Building Height [m]	X Coordinate for Points [m]	Y Coordinate for points [m]	Base Elevation [m]	Release Height [m]
16.00	1.00000		314702.60	3900922.65	101.47	3.40
			314716.43	3901319.50	101.72	3.40
			315499.00	3901295.58	101.34	3.40
			315592.92	3901302.41	101.16	3.40
			316141.05	3901281.92	101.31	3.40
			316378.40	3901234.11	101.20	3.40
			316496.22	3901228.99	101.22	3.40
			316625.99	3901246.06	101.27	3.40

Source Pathway - Source Inputs

AERMOD

Volume Sources Generated from Line Sources

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
HAULROAD	L0000001	314702.87	3900930.65	101.47	3.40	0.00690	16.00		7.44	3.16
	L0000002	314703.43	3900946.64	101.48	3.40	0.00690	16.00		7.44	3.16
	L0000003	314703.99	3900962.63	101.49	3.40	0.00690	16.00		7.44	3.16
	L0000004	314704.55	3900978.62	101.50	3.40	0.00690	16.00		7.44	3.16
	L0000005	314705.10	3900994.61	101.51	3.40	0.00690	16.00		7.44	3.16
	L0000006	314705.66	3901010.60	101.52	3.40	0.00690	16.00		7.44	3.16
	L0000007	314706.22	3901026.59	101.53	3.40	0.00690	16.00		7.44	3.16
	L0000008	314706.78	3901042.58	101.54	3.40	0.00690	16.00		7.44	3.16
	L0000009	314707.33	3901058.57	101.55	3.40	0.00690	16.00		7.44	3.16
	L0000010	314707.89	3901074.56	101.55	3.40	0.00690	16.00		7.44	3.16
	L0000011	314708.45	3901090.55	101.56	3.40	0.00690	16.00		7.44	3.16
	L0000012	314709.01	3901106.54	101.57	3.40	0.00690	16.00		7.44	3.16
	L0000013	314709.57	3901122.53	101.58	3.40	0.00690	16.00		7.44	3.16
	L0000014	314710.12	3901138.52	101.59	3.40	0.00690	16.00		7.44	3.16
	L0000015	314710.68	3901154.51	101.61	3.40	0.00690	16.00		7.44	3.16
	L0000016	314711.24	3901170.50	101.62	3.40	0.00690	16.00		7.44	3.16
	L0000017	314711.80	3901186.49	101.63	3.40	0.00690	16.00		7.44	3.16
	L0000018	314712.35	3901202.48	101.65	3.40	0.00690	16.00		7.44	3.16
	L0000019	314712.91	3901218.47	101.66	3.40	0.00690	16.00		7.44	3.16
	L0000020	314713.47	3901234.46	101.66	3.40	0.00690	16.00		7.44	3.16
	L0000021	314714.03	3901250.45	101.67	3.40	0.00690	16.00		7.44	3.16
	L0000022	314714.58	3901266.44	101.69	3.40	0.00690	16.00		7.44	3.16
	L0000023	314715.14	3901282.44	101.70	3.40	0.00690	16.00		7.44	3.16
	L0000024	314715.70	3901298.43	101.71	3.40	0.00690	16.00		7.44	3.16

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
HAULROAD	L0000025	314716.26	3901314.42	101.72	3.40	0.00690	16.00		7.44	3.16
	L0000026	314727.34	3901319.17	101.72	3.40	0.00690	16.00		7.44	3.16
	L0000027	314743.33	3901318.68	101.72	3.40	0.00690	16.00		7.44	3.16
	L0000028	314759.32	3901318.19	101.73	3.40	0.00690	16.00		7.44	3.16
	L0000029	314775.31	3901317.71	101.73	3.40	0.00690	16.00		7.44	3.16
	L0000030	314791.31	3901317.22	101.73	3.40	0.00690	16.00		7.44	3.16
	L0000031	314807.30	3901316.73	101.73	3.40	0.00690	16.00		7.44	3.16
	L0000032	314823.29	3901316.24	101.73	3.40	0.00690	16.00		7.44	3.16
	L0000033	314839.28	3901315.75	101.73	3.40	0.00690	16.00		7.44	3.16
	L0000034	314855.28	3901315.26	101.73	3.40	0.00690	16.00		7.44	3.16
	L0000035	314871.27	3901314.77	101.73	3.40	0.00690	16.00		7.44	3.16
	L0000036	314887.26	3901314.28	101.73	3.40	0.00690	16.00		7.44	3.16
	L0000037	314903.25	3901313.79	101.72	3.40	0.00690	16.00		7.44	3.16
	L0000038	314919.25	3901313.31	101.72	3.40	0.00690	16.00		7.44	3.16
	L0000039	314935.24	3901312.82	101.71	3.40	0.00690	16.00		7.44	3.16
	L0000040	314951.23	3901312.33	101.71	3.40	0.00690	16.00		7.44	3.16
	L0000041	314967.22	3901311.84	101.70	3.40	0.00690	16.00		7.44	3.16
	L0000042	314983.22	3901311.35	101.70	3.40	0.00690	16.00		7.44	3.16
	L0000043	314999.21	3901310.86	101.70	3.40	0.00690	16.00		7.44	3.16
	L0000044	315015.20	3901310.37	101.69	3.40	0.00690	16.00		7.44	3.16
	L0000045	315031.19	3901309.88	101.68	3.40	0.00690	16.00		7.44	3.16
	L0000046	315047.19	3901309.39	101.68	3.40	0.00690	16.00		7.44	3.16
	L0000047	315063.18	3901308.91	101.68	3.40	0.00690	16.00		7.44	3.16
	L0000048	315079.17	3901308.42	101.67	3.40	0.00690	16.00		7.44	3.16
	L0000049	315095.16	3901307.93	101.66	3.40	0.00690	16.00		7.44	3.16

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
HAULROAD	L0000050	315111.16	3901307.44	101.66	3.40	0.00690	16.00		7.44	3.16
	L0000051	315127.15	3901306.95	101.64	3.40	0.00690	16.00		7.44	3.16
	L0000052	315143.14	3901306.46	101.64	3.40	0.00690	16.00		7.44	3.16
	L0000053	315159.13	3901305.97	101.63	3.40	0.00690	16.00		7.44	3.16
	L0000054	315175.13	3901305.48	101.62	3.40	0.00690	16.00		7.44	3.16
	L0000055	315191.12	3901305.00	101.61	3.40	0.00690	16.00		7.44	3.16
	L0000056	315207.11	3901304.51	101.60	3.40	0.00690	16.00		7.44	3.16
	L0000057	315223.10	3901304.02	101.59	3.40	0.00690	16.00		7.44	3.16
	L0000058	315239.10	3901303.53	101.58	3.40	0.00690	16.00		7.44	3.16
	L0000059	315255.09	3901303.04	101.57	3.40	0.00690	16.00		7.44	3.16
	L0000060	315271.08	3901302.55	101.55	3.40	0.00690	16.00		7.44	3.16
	L0000061	315287.07	3901302.06	101.54	3.40	0.00690	16.00		7.44	3.16
	L0000062	315303.07	3901301.57	101.52	3.40	0.00690	16.00		7.44	3.16
	L0000063	315319.06	3901301.08	101.51	3.40	0.00690	16.00		7.44	3.16
	L0000064	315335.05	3901300.60	101.50	3.40	0.00690	16.00		7.44	3.16
	L0000065	315351.04	3901300.11	101.48	3.40	0.00690	16.00		7.44	3.16
	L0000066	315367.04	3901299.62	101.47	3.40	0.00690	16.00		7.44	3.16
	L0000067	315383.03	3901299.13	101.45	3.40	0.00690	16.00		7.44	3.16
	L0000068	315399.02	3901298.64	101.44	3.40	0.00690	16.00		7.44	3.16
	L0000069	315415.01	3901298.15	101.42	3.40	0.00690	16.00		7.44	3.16
	L0000070	315431.01	3901297.66	101.41	3.40	0.00690	16.00		7.44	3.16
	L0000071	315447.00	3901297.17	101.39	3.40	0.00690	16.00		7.44	3.16
	L0000072	315462.99	3901296.69	101.38	3.40	0.00690	16.00		7.44	3.16
	L0000073	315478.98	3901296.20	101.36	3.40	0.00690	16.00		7.44	3.16
	L0000074	315494.98	3901295.71	101.34	3.40	0.00690	16.00		7.44	3.16

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
HAULROAD	L0000075	315510.94	3901296.45	101.32	3.40	0.00690	16.00		7.44	3.16
	L0000076	315526.90	3901297.61	101.30	3.40	0.00690	16.00		7.44	3.16
	L0000077	315542.86	3901298.77	101.25	3.40	0.00690	16.00		7.44	3.16
	L0000078	315558.82	3901299.93	101.22	3.40	0.00690	16.00		7.44	3.16
	L0000079	315574.78	3901301.10	101.20	3.40	0.00690	16.00		7.44	3.16
	L0000080	315590.73	3901302.26	101.17	3.40	0.00690	16.00		7.44	3.16
	L0000081	315606.72	3901301.90	101.15	3.40	0.00690	16.00		7.44	3.16
	L0000082	315622.71	3901301.30	101.13	3.40	0.00690	16.00		7.44	3.16
	L0000083	315638.70	3901300.70	101.10	3.40	0.00690	16.00		7.44	3.16
	L0000084	315654.68	3901300.11	101.08	3.40	0.00690	16.00		7.44	3.16
	L0000085	315670.67	3901299.51	101.05	3.40	0.00690	16.00		7.44	3.16
	L0000086	315686.66	3901298.91	101.04	3.40	0.00690	16.00		7.44	3.16
	L0000087	315702.65	3901298.31	101.03	3.40	0.00690	16.00		7.44	3.16
	L0000088	315718.64	3901297.71	101.03	3.40	0.00690	16.00		7.44	3.16
	L0000089	315734.63	3901297.12	101.02	3.40	0.00690	16.00		7.44	3.16
	L0000090	315750.62	3901296.52	101.02	3.40	0.00690	16.00		7.44	3.16
	L0000091	315766.61	3901295.92	101.02	3.40	0.00690	16.00		7.44	3.16
	L0000092	315782.59	3901295.32	101.03	3.40	0.00690	16.00		7.44	3.16
	L0000093	315798.58	3901294.73	101.03	3.40	0.00690	16.00		7.44	3.16
	L0000094	315814.57	3901294.13	101.04	3.40	0.00690	16.00		7.44	3.16
	L0000095	315830.56	3901293.53	101.06	3.40	0.00690	16.00		7.44	3.16
	L0000096	315846.55	3901292.93	101.08	3.40	0.00690	16.00		7.44	3.16
	L0000097	315862.54	3901292.34	101.10	3.40	0.00690	16.00		7.44	3.16
	L0000098	315878.53	3901291.74	101.14	3.40	0.00690	16.00		7.44	3.16
	L0000099	315894.52	3901291.14	101.16	3.40	0.00690	16.00		7.44	3.16

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
HAULROAD	L0000100	315910.51	3901290.54	101.19	3.40	0.00690	16.00		7.44	3.16
	L0000101	315926.49	3901289.94	101.20	3.40	0.00690	16.00		7.44	3.16
	L0000102	315942.48	3901289.35	101.22	3.40	0.00690	16.00		7.44	3.16
	L0000103	315958.47	3901288.75	101.23	3.40	0.00690	16.00		7.44	3.16
	L0000104	315974.46	3901288.15	101.23	3.40	0.00690	16.00		7.44	3.16
	L0000105	315990.45	3901287.55	101.24	3.40	0.00690	16.00		7.44	3.16
	L0000106	316006.44	3901286.96	101.27	3.40	0.00690	16.00		7.44	3.16
	L0000107	316022.43	3901286.36	101.28	3.40	0.00690	16.00		7.44	3.16
	L0000108	316038.42	3901285.76	101.28	3.40	0.00690	16.00		7.44	3.16
	L0000109	316054.41	3901285.16	101.28	3.40	0.00690	16.00		7.44	3.16
	L0000110	316070.39	3901284.57	101.29	3.40	0.00690	16.00		7.44	3.16
	L0000111	316086.38	3901283.97	101.30	3.40	0.00690	16.00		7.44	3.16
	L0000112	316102.37	3901283.37	101.30	3.40	0.00690	16.00		7.44	3.16
	L0000113	316118.36	3901282.77	101.30	3.40	0.00690	16.00		7.44	3.16
	L0000114	316134.35	3901282.17	101.30	3.40	0.00690	16.00		7.44	3.16
	L0000115	316150.16	3901280.09	101.30	3.40	0.00690	16.00		7.44	3.16
	L0000116	316165.85	3901276.93	101.29	3.40	0.00690	16.00		7.44	3.16
	L0000117	316181.53	3901273.77	101.29	3.40	0.00690	16.00		7.44	3.16
	L0000118	316197.22	3901270.61	101.29	3.40	0.00690	16.00		7.44	3.16
	L0000119	316212.90	3901267.45	101.28	3.40	0.00690	16.00		7.44	3.16
	L0000120	316228.59	3901264.29	101.28	3.40	0.00690	16.00		7.44	3.16
	L0000121	316244.27	3901261.13	101.27	3.40	0.00690	16.00		7.44	3.16
	L0000122	316259.96	3901257.97	101.27	3.40	0.00690	16.00		7.44	3.16
	L0000123	316275.64	3901254.81	101.27	3.40	0.00690	16.00		7.44	3.16
	L0000124	316291.33	3901251.65	101.26	3.40	0.00690	16.00		7.44	3.16

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
HAULROAD	L0000125	316307.01	3901248.49	101.25	3.40	0.00690	16.00		7.44	3.16
	L0000126	316322.70	3901245.33	101.25	3.40	0.00690	16.00		7.44	3.16
	L0000127	316338.38	3901242.17	101.24	3.40	0.00690	16.00		7.44	3.16
	L0000128	316354.07	3901239.01	101.24	3.40	0.00690	16.00		7.44	3.16
	L0000129	316369.75	3901235.85	101.22	3.40	0.00690	16.00		7.44	3.16
	L0000130	316385.57	3901233.80	101.21	3.40	0.00690	16.00		7.44	3.16
	L0000131	316401.55	3901233.11	101.22	3.40	0.00690	16.00		7.44	3.16
	L0000132	316417.54	3901232.41	101.21	3.40	0.00690	16.00		7.44	3.16
	L0000133	316433.52	3901231.72	101.21	3.40	0.00690	16.00		7.44	3.16
	L0000134	316449.51	3901231.02	101.21	3.40	0.00690	16.00		7.44	3.16
	L0000135	316465.49	3901230.33	101.21	3.40	0.00690	16.00		7.44	3.16
	L0000136	316481.48	3901229.63	101.22	3.40	0.00690	16.00		7.44	3.16
	L0000137	316497.45	3901229.15	101.22	3.40	0.00690	16.00		7.44	3.16
	L0000138	316513.32	3901231.24	101.22	3.40	0.00690	16.00		7.44	3.16
	L0000139	316529.18	3901233.33	101.23	3.40	0.00690	16.00		7.44	3.16
	L0000140	316545.04	3901235.41	101.24	3.40	0.00690	16.00		7.44	3.16
	L0000141	316560.91	3901237.50	101.25	3.40	0.00690	16.00		7.44	3.16
	L0000142	316576.77	3901239.59	101.26	3.40	0.00690	16.00		7.44	3.16
	L0000143	316592.63	3901241.68	101.26	3.40	0.00690	16.00		7.44	3.16
	L0000144	316608.50	3901243.76	101.27	3.40	0.00690	16.00		7.44	3.16
	L0000145	316624.36	3901245.85	101.27	3.40	0.00690	16.00		7.44	3.16

Source Pathway

Building Downwash Information

Option not in use

Emission Rate Units for Output

For Concentration

Unit Factor:	1E6
Emission Unit Label:	GRAMS/SEC
Concentration Unit Label:	MICROGRAMS/M**3

Source Groups

Source Group ID:	List of Sources in Group (Source Range or Single Sources)
SITE	SITE
HAULROAD	HAULROAD
ALL	All Sources Included

Variable Emissions

Hour-of-Day / Day-of-Week Emission Rate Variation

Scenario: Scenario 2

Source ID:	**HAULROAD**							
Weekdays								
	Hour of Day	1 - 6	0.00	0.00	0.00	0.00	0.00	0.00
		7 - 12	0.00	2.80	2.80	2.80	2.80	2.80
		13 - 18	2.80	2.80	2.80	2.80	2.80	2.80
		19 - 24	2.80	0.00	0.00	0.00	0.00	0.00
Saturday								
	Hour of Day	1 - 6	0.00	0.00	0.00	0.00	0.00	0.00
		7 - 12	0.00	0.00	0.00	0.00	0.00	0.00
		13 - 18	0.00	0.00	0.00	0.00	0.00	0.00
		19 - 24	0.00	0.00	0.00	0.00	0.00	0.00
Sunday								
	Hour of Day	1 - 6	0.00	0.00	0.00	0.00	0.00	0.00
		7 - 12	0.00	0.00	0.00	0.00	0.00	0.00
		13 - 18	0.00	0.00	0.00	0.00	0.00	0.00
		19 - 24	0.00	0.00	0.00	0.00	0.00	0.00
Source ID:	**SITE**							
Weekdays								
	Hour of Day	1 - 6	0.00	0.00	0.00	0.00	0.00	0.00
		7 - 12	0.00	2.80	2.80	2.80	2.80	2.80
		13 - 18	2.80	2.80	2.80	2.80	2.80	2.80
		19 - 24	2.80	0.00	0.00	0.00	0.00	0.00
Saturday								
	Hour of Day	1 - 6	0.00	0.00	0.00	0.00	0.00	0.00
		7 - 12	0.00	0.00	0.00	0.00	0.00	0.00
		13 - 18	0.00	0.00	0.00	0.00	0.00	0.00
		19 - 24	0.00	0.00	0.00	0.00	0.00	0.00
Sunday								
	Hour of Day	1 - 6	0.00	0.00	0.00	0.00	0.00	0.00
		7 - 12	0.00	0.00	0.00	0.00	0.00	0.00
		13 - 18	0.00	0.00	0.00	0.00	0.00	0.00
		19 - 24	0.00	0.00	0.00	0.00	0.00	0.00

Receptor Pathway

Receptor Networks

Note: Terrain Elavations and Flagpole Heights for Network Grids are in Page RE2 - 1 (If applicable)
Generated Discrete Receptors for Multi-Tier (Risk) Grid and Receptor Locations for Fenceline Grid are in Page RE3 - 1 (If applicable)

Discrete Receptors

Discrete Cartesian Receptors

Record Number	X-Coordinate [m]	Y-Coordinate [m]	Group Name (Optional)	Terrain Elevations	Flagpole Heights [m] (Optional)
1	314994.08	3900662.90	NESTED	101.33	
2	315044.08	3900662.90	NESTED	101.30	
3	315094.08	3900662.90	NESTED	101.28	
4	314994.08	3900712.90	NESTED	101.36	
5	315044.08	3900712.90	NESTED	101.34	
6	315094.08	3900712.90	NESTED	101.32	
7	314994.08	3900762.90	NESTED	101.39	
8	315044.08	3900762.90	NESTED	101.38	
9	315094.08	3900762.90	NESTED	101.35	
10	314994.08	3900812.90	NESTED	101.43	
11	315044.08	3900812.90	NESTED	101.42	
12	315094.08	3900812.90	NESTED	101.40	
13	314994.08	3900862.90	NESTED	101.47	
14	315044.08	3900862.90	NESTED	101.45	
15	315094.08	3900862.90	NESTED	101.42	
16	314994.08	3900912.90	NESTED	101.50	
17	315044.08	3900912.90	NESTED	101.47	
18	315094.08	3900912.90	NESTED	101.45	
19	314994.08	3900962.90	NESTED	101.53	
20	315044.08	3900962.90	NESTED	101.51	
21	315094.08	3900962.90	NESTED	101.48	
22	314994.08	3901012.90	NESTED	101.56	
23	315044.08	3901012.90	NESTED	101.54	
24	315094.08	3901012.90	NESTED	101.50	
25	314994.08	3901062.90	NESTED	101.59	
26	315044.08	3901062.90	NESTED	101.57	
27	315094.08	3901062.90	NESTED	101.54	
28	314994.08	3901112.90	NESTED	101.61	
29	315044.08	3901112.90	NESTED	101.59	
30	315094.08	3901112.90	NESTED	101.57	

31	314494.08	3901162.90	NESTED	101.54
32	314544.08	3901162.90	NESTED	101.56
33	314594.08	3901162.90	NESTED	101.58
34	314644.08	3901162.90	NESTED	101.59
35	314994.08	3901162.90	NESTED	101.64
36	315044.08	3901162.90	NESTED	101.61
37	315094.08	3901162.90	NESTED	101.60
38	314494.08	3901212.90	NESTED	101.60
39	314544.08	3901212.90	NESTED	101.60
40	314594.08	3901212.90	NESTED	101.62
41	314644.08	3901212.90	NESTED	101.63
42	314994.08	3901212.90	NESTED	101.66
43	315044.08	3901212.90	NESTED	101.65
44	315094.08	3901212.90	NESTED	101.63
45	314494.08	3901262.90	NESTED	101.65
46	314544.08	3901262.90	NESTED	101.66
47	314594.08	3901262.90	NESTED	101.66
48	314644.08	3901262.90	NESTED	101.67
49	314994.08	3901262.90	NESTED	101.68
50	315044.08	3901262.90	NESTED	101.67
51	315094.08	3901262.90	NESTED	101.65
52	314194.08	3900362.90	NESTED	100.41
53	314244.08	3900362.90	NESTED	100.45
54	314294.08	3900362.90	NESTED	100.50
55	314344.08	3900362.90	NESTED	100.55
56	314394.08	3900362.90	NESTED	100.59
57	314444.08	3900362.90	NESTED	100.64
58	314494.08	3900362.90	NESTED	100.68
59	314544.08	3900362.90	NESTED	100.74
60	314594.08	3900362.90	NESTED	100.78
61	314644.08	3900362.90	NESTED	100.83
62	314694.08	3900362.90	NESTED	100.85
63	314744.08	3900362.90	NESTED	100.87
64	314794.08	3900362.90	NESTED	100.87
65	314844.08	3900362.90	NESTED	100.87
66	314894.08	3900362.90	NESTED	100.87
67	314944.08	3900362.90	NESTED	100.85
68	314994.08	3900362.90	NESTED	100.82

69	315044.08	3900362.90	NESTED	100.78
70	315094.08	3900362.90	NESTED	100.74
71	315144.08	3900362.90	NESTED	100.69
72	315194.08	3900362.90	NESTED	100.63
73	315244.08	3900362.90	NESTED	100.57
74	315294.08	3900362.90	NESTED	100.51
75	315344.08	3900362.90	NESTED	100.44
76	315394.08	3900362.90	NESTED	100.38
77	314194.08	3900412.90	NESTED	100.47
78	314244.08	3900412.90	NESTED	100.51
79	314294.08	3900412.90	NESTED	100.56
80	314344.08	3900412.90	NESTED	100.62
81	314394.08	3900412.90	NESTED	100.67
82	314444.08	3900412.90	NESTED	100.71
83	314494.08	3900412.90	NESTED	100.76
84	314544.08	3900412.90	NESTED	100.81
85	314594.08	3900412.90	NESTED	100.86
86	314644.08	3900412.90	NESTED	100.91
87	314694.08	3900412.90	NESTED	100.95
88	314744.08	3900412.90	NESTED	100.99
89	314794.08	3900412.90	NESTED	101.00
90	314844.08	3900412.90	NESTED	101.01
91	314894.08	3900412.90	NESTED	101.01
92	314944.08	3900412.90	NESTED	100.99
93	314994.08	3900412.90	NESTED	100.96
94	315044.08	3900412.90	NESTED	100.92
95	315094.08	3900412.90	NESTED	100.86
96	315144.08	3900412.90	NESTED	100.81
97	315194.08	3900412.90	NESTED	100.76
98	315244.08	3900412.90	NESTED	100.70
99	315294.08	3900412.90	NESTED	100.64
100	315344.08	3900412.90	NESTED	100.57
101	315394.08	3900412.90	NESTED	100.51
102	314194.08	3900462.90	NESTED	100.54
103	314244.08	3900462.90	NESTED	100.58
104	314294.08	3900462.90	NESTED	100.63
105	314394.08	3900462.90	NESTED	100.73
106	314444.08	3900462.90	NESTED	100.78

107	314494.08	3900462.90	NESTED	100.83
108	314544.08	3900462.90	NESTED	100.88
109	314594.08	3900462.90	NESTED	100.94
110	314644.08	3900462.90	NESTED	101.00
111	314694.08	3900462.90	NESTED	101.05
112	314744.08	3900462.90	NESTED	101.08
113	314794.08	3900462.90	NESTED	101.12
114	314844.08	3900462.90	NESTED	101.14
115	314894.08	3900462.90	NESTED	101.13
116	314944.08	3900462.90	NESTED	101.11
117	314994.08	3900462.90	NESTED	101.07
118	315044.08	3900462.90	NESTED	101.03
119	315094.08	3900462.90	NESTED	100.97
120	315144.08	3900462.90	NESTED	100.93
121	315194.08	3900462.90	NESTED	100.88
122	315244.08	3900462.90	NESTED	100.82
123	315294.08	3900462.90	NESTED	100.76
124	315344.08	3900462.90	NESTED	100.69
125	315394.08	3900462.90	NESTED	100.62
126	314194.08	3900512.90	NESTED	100.60
127	314244.08	3900512.90	NESTED	100.65
128	314294.08	3900512.90	NESTED	100.70
129	314344.08	3900512.90	NESTED	100.75
130	314394.08	3900512.90	NESTED	100.80
131	314444.08	3900512.90	NESTED	100.84
132	314994.08	3900512.90	NESTED	101.17
133	315044.08	3900512.90	NESTED	101.11
134	315094.08	3900512.90	NESTED	101.06
135	315144.08	3900512.90	NESTED	101.02
136	315194.08	3900512.90	NESTED	100.97
137	315244.08	3900512.90	NESTED	100.92
138	315294.08	3900512.90	NESTED	100.86
139	315344.08	3900512.90	NESTED	100.79
140	315394.08	3900512.90	NESTED	100.72
141	314194.08	3900562.90	NESTED	100.69
142	314244.08	3900562.90	NESTED	100.73
143	314294.08	3900562.90	NESTED	100.77
144	314344.08	3900562.90	NESTED	100.82

145	314394.08	3900562.90	NESTED	100.87
146	314444.08	3900562.90	NESTED	100.91
147	314994.08	3900562.90	NESTED	101.25
148	315044.08	3900562.90	NESTED	101.20
149	315094.08	3900562.90	NESTED	101.15
150	315144.08	3900562.90	NESTED	101.10
151	315194.08	3900562.90	NESTED	101.06
152	315244.08	3900562.90	NESTED	101.01
153	315294.08	3900562.90	NESTED	100.94
154	315344.08	3900562.90	NESTED	100.88
155	315394.08	3900562.90	NESTED	100.80
156	314194.08	3900612.90	NESTED	100.75
157	314244.08	3900612.90	NESTED	100.79
158	314294.08	3900612.90	NESTED	100.84
159	314344.08	3900612.90	NESTED	100.88
160	314394.08	3900612.90	NESTED	100.93
161	314444.08	3900612.90	NESTED	100.97
162	314994.08	3900612.90	NESTED	101.29
163	315044.08	3900612.90	NESTED	101.27
164	315094.08	3900612.90	NESTED	101.23
165	315144.08	3900612.90	NESTED	101.18
166	315194.08	3900612.90	NESTED	101.14
167	315244.08	3900612.90	NESTED	101.09
168	315294.08	3900612.90	NESTED	101.03
169	315344.08	3900612.90	NESTED	100.94
170	315394.08	3900612.90	NESTED	100.88
171	314194.08	3900662.90	NESTED	100.81
172	314244.08	3900662.90	NESTED	100.85
173	314294.08	3900662.90	NESTED	100.90
174	314344.08	3900662.90	NESTED	100.94
175	314394.08	3900662.90	NESTED	100.99
176	314444.08	3900662.90	NESTED	101.03
177	315144.08	3900662.90	NESTED	101.25
178	315194.08	3900662.90	NESTED	101.21
179	315244.08	3900662.90	NESTED	101.17
180	315294.08	3900662.90	NESTED	101.07
181	315344.08	3900662.90	NESTED	101.00
182	315394.08	3900662.90	NESTED	100.95

183	314194.08	3900712.90	NESTED	100.87
184	314244.08	3900712.90	NESTED	100.91
185	314294.08	3900712.90	NESTED	100.95
186	314344.08	3900712.90	NESTED	100.99
187	314394.08	3900712.90	NESTED	101.04
188	314444.08	3900712.90	NESTED	101.09
189	315144.08	3900712.90	NESTED	101.29
190	315194.08	3900712.90	NESTED	101.27
191	315244.08	3900712.90	NESTED	101.17
192	315294.08	3900712.90	NESTED	101.11
193	315344.08	3900712.90	NESTED	101.08
194	315394.08	3900712.90	NESTED	101.04
195	314194.08	3900762.90	NESTED	100.93
196	314244.08	3900762.90	NESTED	100.97
197	314294.08	3900762.90	NESTED	101.01
198	314344.08	3900762.90	NESTED	101.05
199	314394.08	3900762.90	NESTED	101.09
200	314444.08	3900762.90	NESTED	101.14
201	315144.08	3900762.90	NESTED	101.34
202	315194.08	3900762.90	NESTED	101.31
203	315244.08	3900762.90	NESTED	101.24
204	315294.08	3900762.90	NESTED	101.20
205	315344.08	3900762.90	NESTED	101.15
206	315394.08	3900762.90	NESTED	101.10
207	314194.08	3900812.90	NESTED	100.99
208	314244.08	3900812.90	NESTED	101.03
209	314294.08	3900812.90	NESTED	101.07
210	314344.08	3900812.90	NESTED	101.11
211	314394.08	3900812.90	NESTED	101.14
212	314444.08	3900812.90	NESTED	101.18
213	315144.08	3900812.90	NESTED	101.37
214	315194.08	3900812.90	NESTED	101.33
215	315244.08	3900812.90	NESTED	101.29
216	315294.08	3900812.90	NESTED	101.26
217	315344.08	3900812.90	NESTED	101.21
218	315394.08	3900812.90	NESTED	101.16
219	314194.08	3900862.90	NESTED	101.06
220	314244.08	3900862.90	NESTED	101.09

221	314294.08	3900862.90	NESTED	101.13
222	314344.08	3900862.90	NESTED	101.16
223	314394.08	3900862.90	NESTED	101.20
224	314444.08	3900862.90	NESTED	101.23
225	315144.08	3900862.90	NESTED	101.39
226	315194.08	3900862.90	NESTED	101.35
227	315244.08	3900862.90	NESTED	101.32
228	315294.08	3900862.90	NESTED	101.30
229	315344.08	3900862.90	NESTED	101.27
230	315394.08	3900862.90	NESTED	101.22
231	314194.08	3900912.90	NESTED	101.13
232	314244.08	3900912.90	NESTED	101.16
233	314294.08	3900912.90	NESTED	101.19
234	314344.08	3900912.90	NESTED	101.23
235	314394.08	3900912.90	NESTED	101.26
236	314444.08	3900912.90	NESTED	101.29
237	315144.08	3900912.90	NESTED	101.41
238	315194.08	3900912.90	NESTED	101.39
239	315244.08	3900912.90	NESTED	101.35
240	315294.08	3900912.90	NESTED	101.34
241	315344.08	3900912.90	NESTED	101.30
242	315394.08	3900912.90	NESTED	101.26
243	314194.08	3900962.90	NESTED	101.19
244	314244.08	3900962.90	NESTED	101.22
245	314294.08	3900962.90	NESTED	101.26
246	314344.08	3900962.90	NESTED	101.29
247	314394.08	3900962.90	NESTED	101.31
248	314444.08	3900962.90	NESTED	101.33
249	315144.08	3900962.90	NESTED	101.45
250	315194.08	3900962.90	NESTED	101.43
251	315244.08	3900962.90	NESTED	101.38
252	315294.08	3900962.90	NESTED	101.37
253	315344.08	3900962.90	NESTED	101.33
254	315394.08	3900962.90	NESTED	101.28
255	314194.08	3901012.90	NESTED	101.25
256	314244.08	3901012.90	NESTED	101.28
257	314294.08	3901012.90	NESTED	101.31
258	314344.08	3901012.90	NESTED	101.33

259	314394.08	3901012.90	NESTED	101.36
260	314444.08	3901012.90	NESTED	101.38
261	315144.08	3901012.90	NESTED	101.48
262	315194.08	3901012.90	NESTED	101.46
263	315244.08	3901012.90	NESTED	101.42
264	315294.08	3901012.90	NESTED	101.39
265	315344.08	3901012.90	NESTED	101.36
266	315394.08	3901012.90	NESTED	101.30
267	314194.08	3901062.90	NESTED	101.31
268	314244.08	3901062.90	NESTED	101.33
269	314294.08	3901062.90	NESTED	101.36
270	314344.08	3901062.90	NESTED	101.39
271	314394.08	3901062.90	NESTED	101.41
272	314444.08	3901062.90	NESTED	101.43
273	315144.08	3901062.90	NESTED	101.51
274	315194.08	3901062.90	NESTED	101.49
275	315244.08	3901062.90	NESTED	101.45
276	315294.08	3901062.90	NESTED	101.42
277	315344.08	3901062.90	NESTED	101.38
278	315394.08	3901062.90	NESTED	101.33
279	314194.08	3901112.90	NESTED	101.36
280	314244.08	3901112.90	NESTED	101.38
281	314294.08	3901112.90	NESTED	101.41
282	314344.08	3901112.90	NESTED	101.44
283	314394.08	3901112.90	NESTED	101.46
284	314444.08	3901112.90	NESTED	101.47
285	315144.08	3901112.90	NESTED	101.55
286	315194.08	3901112.90	NESTED	101.52
287	315244.08	3901112.90	NESTED	101.48
288	315294.08	3901112.90	NESTED	101.44
289	315344.08	3901112.90	NESTED	101.41
290	315394.08	3901112.90	NESTED	101.36
291	314194.08	3901162.90	NESTED	101.41
292	314244.08	3901162.90	NESTED	101.44
293	314294.08	3901162.90	NESTED	101.46
294	314344.08	3901162.90	NESTED	101.48
295	314394.08	3901162.90	NESTED	101.51
296	314444.08	3901162.90	NESTED	101.52

297	315144.08	3901162.90	NESTED	101.58
298	315194.08	3901162.90	NESTED	101.55
299	315244.08	3901162.90	NESTED	101.50
300	315294.08	3901162.90	NESTED	101.48
301	315344.08	3901162.90	NESTED	101.43
302	315394.08	3901162.90	NESTED	101.39
303	314194.08	3901212.90	NESTED	101.46
304	314244.08	3901212.90	NESTED	101.48
305	314294.08	3901212.90	NESTED	101.51
306	314344.08	3901212.90	NESTED	101.53
307	314394.08	3901212.90	NESTED	101.56
308	314444.08	3901212.90	NESTED	101.58
309	315144.08	3901212.90	NESTED	101.60
310	315194.08	3901212.90	NESTED	101.58
311	315244.08	3901212.90	NESTED	101.53
312	315294.08	3901212.90	NESTED	101.50
313	315344.08	3901212.90	NESTED	101.46
314	315394.08	3901212.90	NESTED	101.41
315	314194.08	3901262.90	NESTED	101.51
316	314244.08	3901262.90	NESTED	101.54
317	314294.08	3901262.90	NESTED	101.56
318	314344.08	3901262.90	NESTED	101.59
319	314394.08	3901262.90	NESTED	101.61
320	314444.08	3901262.90	NESTED	101.63
321	315144.08	3901262.90	NESTED	101.62
322	315194.08	3901262.90	NESTED	101.59
323	315244.08	3901262.90	NESTED	101.56
324	315294.08	3901262.90	NESTED	101.52
325	315344.08	3901262.90	NESTED	101.48
326	315394.08	3901262.90	NESTED	101.44
327	314194.08	3901312.90	NESTED	101.58
328	314244.08	3901312.90	NESTED	101.59
329	314294.08	3901312.90	NESTED	101.61
330	314344.08	3901312.90	NESTED	101.63
331	314394.08	3901312.90	NESTED	101.66
332	314444.08	3901312.90	NESTED	101.67
333	314494.08	3901312.90	NESTED	101.68
334	314544.08	3901312.90	NESTED	101.69

335	314594.08	3901312.90	NESTED	101.70
336	314644.08	3901312.90	NESTED	101.71
337	314694.08	3901312.90	NESTED	101.72
338	314744.08	3901312.90	NESTED	101.72
339	314794.08	3901312.90	NESTED	101.73
340	314844.08	3901312.90	NESTED	101.73
341	314894.08	3901312.90	NESTED	101.73
342	314944.08	3901312.90	NESTED	101.71
343	314994.08	3901312.90	NESTED	101.70
344	315044.08	3901312.90	NESTED	101.69
345	315094.08	3901312.90	NESTED	101.67
346	315144.08	3901312.90	NESTED	101.64
347	315194.08	3901312.90	NESTED	101.61
348	315244.08	3901312.90	NESTED	101.58
349	315294.08	3901312.90	NESTED	101.54
350	315344.08	3901312.90	NESTED	101.49
351	315394.08	3901312.90	NESTED	101.44
352	314194.08	3901362.90	NESTED	101.63
353	314244.08	3901362.90	NESTED	101.65
354	314294.08	3901362.90	NESTED	101.66
355	314344.08	3901362.90	NESTED	101.68
356	314394.08	3901362.90	NESTED	101.70
357	314444.08	3901362.90	NESTED	101.71
358	314494.08	3901362.90	NESTED	101.72
359	314544.08	3901362.90	NESTED	101.73
360	314594.08	3901362.90	NESTED	101.74
361	314644.08	3901362.90	NESTED	101.75
362	314694.08	3901362.90	NESTED	101.75
363	314744.08	3901362.90	NESTED	101.76
364	314794.08	3901362.90	NESTED	101.75
365	314844.08	3901362.90	NESTED	101.75
366	314894.08	3901362.90	NESTED	101.74
367	314944.08	3901362.90	NESTED	101.73
368	314994.08	3901362.90	NESTED	101.71
369	315044.08	3901362.90	NESTED	101.70
370	315094.08	3901362.90	NESTED	101.68
371	315144.08	3901362.90	NESTED	101.65
372	315194.08	3901362.90	NESTED	101.62

373	315244.08	3901362.90	NESTED	101.58
374	315294.08	3901362.90	NESTED	101.54
375	315344.08	3901362.90	NESTED	101.49
376	315394.08	3901362.90	NESTED	101.44
377	314194.08	3901412.90	NESTED	101.69
378	314244.08	3901412.90	NESTED	101.71
379	314294.08	3901412.90	NESTED	101.72
380	314344.08	3901412.90	NESTED	101.75
381	314394.08	3901412.90	NESTED	101.75
382	314444.08	3901412.90	NESTED	101.76
383	314494.08	3901412.90	NESTED	101.78
384	314544.08	3901412.90	NESTED	101.78
385	314594.08	3901412.90	NESTED	101.79
386	314644.08	3901412.90	NESTED	101.80
387	314694.08	3901412.90	NESTED	101.81
388	314744.08	3901412.90	NESTED	101.80
389	314794.08	3901412.90	NESTED	101.80
390	314844.08	3901412.90	NESTED	101.79
391	314894.08	3901412.90	NESTED	101.77
392	314944.08	3901412.90	NESTED	101.77
393	314994.08	3901412.90	NESTED	101.75
394	315044.08	3901412.90	NESTED	101.73
395	315094.08	3901412.90	NESTED	101.71
396	315144.08	3901412.90	NESTED	101.68
397	315194.08	3901412.90	NESTED	101.64
398	315244.08	3901412.90	NESTED	101.60
399	315294.08	3901412.90	NESTED	101.56
400	315344.08	3901412.90	NESTED	101.51
401	315394.08	3901412.90	NESTED	101.46
402	314194.08	3901462.90	NESTED	101.76
403	314244.08	3901462.90	NESTED	101.77
404	314294.08	3901462.90	NESTED	101.78
405	314344.08	3901462.90	NESTED	101.79
406	314394.08	3901462.90	NESTED	101.81
407	314444.08	3901462.90	NESTED	101.83
408	314494.08	3901462.90	NESTED	101.83
409	314544.08	3901462.90	NESTED	101.84
410	314594.08	3901462.90	NESTED	101.86

411	314644.08	3901462.90	NESTED	101.86
412	314694.08	3901462.90	NESTED	101.87
413	314744.08	3901462.90	NESTED	101.87
414	314794.08	3901462.90	NESTED	101.85
415	314844.08	3901462.90	NESTED	101.84
416	314894.08	3901462.90	NESTED	101.82
417	314944.08	3901462.90	NESTED	101.81
418	314994.08	3901462.90	NESTED	101.80
419	315044.08	3901462.90	NESTED	101.77
420	315094.08	3901462.90	NESTED	101.75
421	315144.08	3901462.90	NESTED	101.72
422	315194.08	3901462.90	NESTED	101.68
423	315244.08	3901462.90	NESTED	101.64
424	315294.08	3901462.90	NESTED	101.60
425	315344.08	3901462.90	NESTED	101.55
426	315394.08	3901462.90	NESTED	101.49
427	314194.08	3901512.90	NESTED	101.82
428	314244.08	3901512.90	NESTED	101.84
429	314294.08	3901512.90	NESTED	101.85
430	314344.08	3901512.90	NESTED	101.86
431	314394.08	3901512.90	NESTED	101.87
432	314444.08	3901512.90	NESTED	101.88
433	314494.08	3901512.90	NESTED	101.89
434	314544.08	3901512.90	NESTED	101.92
435	314594.08	3901512.90	NESTED	101.93
436	314644.08	3901512.90	NESTED	101.93
437	314694.08	3901512.90	NESTED	101.93
438	314744.08	3901512.90	NESTED	101.93
439	314794.08	3901512.90	NESTED	101.91
440	314844.08	3901512.90	NESTED	101.91
441	314894.08	3901512.90	NESTED	101.89
442	314944.08	3901512.90	NESTED	101.88
443	314994.08	3901512.90	NESTED	101.86
444	315044.08	3901512.90	NESTED	101.84
445	315094.08	3901512.90	NESTED	101.80
446	315144.08	3901512.90	NESTED	101.77
447	315194.08	3901512.90	NESTED	101.73
448	315244.08	3901512.90	NESTED	101.69

449	315294.08	3901512.90	NESTED	101.64
450	315344.08	3901512.90	NESTED	101.60
451	315394.08	3901512.90	NESTED	101.54
452	314194.08	3901562.90	NESTED	101.89
453	314244.08	3901562.90	NESTED	101.91
454	314294.08	3901562.90	NESTED	101.92
455	314344.08	3901562.90	NESTED	101.93
456	314394.08	3901562.90	NESTED	101.93
457	314444.08	3901562.90	NESTED	101.94
458	314494.08	3901562.90	NESTED	101.96
459	314544.08	3901562.90	NESTED	101.98
460	314594.08	3901562.90	NESTED	102.00
461	314644.08	3901562.90	NESTED	102.01
462	314694.08	3901562.90	NESTED	102.01
463	314744.08	3901562.90	NESTED	102.01
464	314794.08	3901562.90	NESTED	101.99
465	314844.08	3901562.90	NESTED	101.98
466	314894.08	3901562.90	NESTED	101.97
467	314944.08	3901562.90	NESTED	101.96
468	314994.08	3901562.90	NESTED	101.94
469	315044.08	3901562.90	NESTED	101.91
470	315094.08	3901562.90	NESTED	101.88
471	315144.08	3901562.90	NESTED	101.84
472	315194.08	3901562.90	NESTED	101.80
473	315244.08	3901562.90	NESTED	101.75
474	315294.08	3901562.90	NESTED	101.71
475	315344.08	3901562.90	NESTED	101.66
476	315394.08	3901562.90	NESTED	101.62
477	313194.08	3899362.90	NESTED	98.65
478	313294.08	3899362.90	NESTED	98.62
479	313394.08	3899362.90	NESTED	98.61
480	313494.08	3899362.90	NESTED	98.54
481	313594.08	3899362.90	NESTED	98.37
482	313694.08	3899362.90	NESTED	98.33
483	313794.08	3899362.90	NESTED	98.34
484	313894.08	3899362.90	NESTED	98.34
485	313994.08	3899362.90	NESTED	98.36
486	314094.08	3899362.90	NESTED	98.37

487	314194.08	3899362.90	NESTED	98.37
488	314294.08	3899362.90	NESTED	98.37
489	314394.08	3899362.90	NESTED	98.39
490	314494.08	3899362.90	NESTED	98.36
491	314594.08	3899362.90	NESTED	98.39
492	314694.08	3899362.90	NESTED	98.35
493	314794.08	3899362.90	NESTED	98.37
494	314894.08	3899362.90	NESTED	98.36
495	314994.08	3899362.90	NESTED	98.38
496	315094.08	3899362.90	NESTED	98.42
497	315194.08	3899362.90	NESTED	98.48
498	315294.08	3899362.90	NESTED	98.42
499	315394.08	3899362.90	NESTED	98.32
500	315494.08	3899362.90	NESTED	98.20
501	315594.08	3899362.90	NESTED	98.15
502	315694.08	3899362.90	NESTED	98.09
503	315794.08	3899362.90	NESTED	98.12
504	315894.08	3899362.90	NESTED	98.13
505	315994.08	3899362.90	NESTED	98.16
506	316094.08	3899362.90	NESTED	98.53
507	316194.08	3899362.90	NESTED	98.96
508	316294.08	3899362.90	NESTED	99.74
509	316394.08	3899362.90	NESTED	99.09
510	313194.08	3899462.90	NESTED	98.85
511	313294.08	3899462.90	NESTED	98.81
512	313394.08	3899462.90	NESTED	98.78
513	313494.08	3899462.90	NESTED	98.69
514	313594.08	3899462.90	NESTED	98.61
515	313694.08	3899462.90	NESTED	98.59
516	313794.08	3899462.90	NESTED	98.56
517	313894.08	3899462.90	NESTED	98.59
518	313994.08	3899462.90	NESTED	98.60
519	314094.08	3899462.90	NESTED	98.63
520	314194.08	3899462.90	NESTED	98.67
521	314294.08	3899462.90	NESTED	98.69
522	314394.08	3899462.90	NESTED	98.69
523	314494.08	3899462.90	NESTED	98.64
524	314594.08	3899462.90	NESTED	98.61

525	314694.08	3899462.90	NESTED	98.58
526	314794.08	3899462.90	NESTED	98.56
527	314894.08	3899462.90	NESTED	98.58
528	314994.08	3899462.90	NESTED	98.61
529	315094.08	3899462.90	NESTED	98.62
530	315194.08	3899462.90	NESTED	98.61
531	315294.08	3899462.90	NESTED	98.58
532	315394.08	3899462.90	NESTED	98.49
533	315494.08	3899462.90	NESTED	98.38
534	315594.08	3899462.90	NESTED	98.27
535	315694.08	3899462.90	NESTED	98.26
536	315794.08	3899462.90	NESTED	98.28
537	315894.08	3899462.90	NESTED	98.32
538	315994.08	3899462.90	NESTED	98.36
539	316094.08	3899462.90	NESTED	98.64
540	316194.08	3899462.90	NESTED	99.39
541	316294.08	3899462.90	NESTED	99.73
542	316394.08	3899462.90	NESTED	99.41
543	313194.08	3899562.90	NESTED	99.07
544	313294.08	3899562.90	NESTED	99.04
545	313394.08	3899562.90	NESTED	98.98
546	313494.08	3899562.90	NESTED	98.90
547	313594.08	3899562.90	NESTED	98.84
548	313694.08	3899562.90	NESTED	98.81
549	313794.08	3899562.90	NESTED	98.80
550	313894.08	3899562.90	NESTED	98.82
551	313994.08	3899562.90	NESTED	98.85
552	314094.08	3899562.90	NESTED	98.93
553	314194.08	3899562.90	NESTED	99.00
554	314294.08	3899562.90	NESTED	99.09
555	314394.08	3899562.90	NESTED	99.11
556	314494.08	3899562.90	NESTED	99.06
557	314594.08	3899562.90	NESTED	98.92
558	314694.08	3899562.90	NESTED	98.82
559	314794.08	3899562.90	NESTED	98.79
560	314894.08	3899562.90	NESTED	98.79
561	314994.08	3899562.90	NESTED	98.80
562	315094.08	3899562.90	NESTED	98.79

563	315194.08	3899562.90	NESTED	98.78
564	315294.08	3899562.90	NESTED	98.75
565	315394.08	3899562.90	NESTED	98.68
566	315494.08	3899562.90	NESTED	98.59
567	315594.08	3899562.90	NESTED	98.52
568	315694.08	3899562.90	NESTED	98.52
569	315794.08	3899562.90	NESTED	98.53
570	315894.08	3899562.90	SCHOOL	98.56
571	315994.08	3899562.90	NESTED	98.66
572	316094.08	3899562.90	NESTED	98.86
573	316194.08	3899562.90	NESTED	99.35
574	316294.08	3899562.90	NESTED	99.73
575	316394.08	3899562.90	NESTED	99.55
576	313194.08	3899662.90	NESTED	99.33
577	313294.08	3899662.90	NESTED	99.27
578	313394.08	3899662.90	NESTED	99.20
579	313494.08	3899662.90	NESTED	99.13
580	313594.08	3899662.90	NESTED	99.07
581	313694.08	3899662.90	NESTED	99.05
582	313794.08	3899662.90	NESTED	99.04
583	313894.08	3899662.90	NESTED	99.06
584	313994.08	3899662.90	NESTED	99.12
585	314094.08	3899662.90	NESTED	99.21
586	314194.08	3899662.90	NESTED	99.33
587	314294.08	3899662.90	NESTED	99.45
588	314394.08	3899662.90	NESTED	99.60
589	314494.08	3899662.90	NESTED	99.51
590	314594.08	3899662.90	NESTED	99.16
591	314694.08	3899662.90	NESTED	99.02
592	314794.08	3899662.90	NESTED	98.98
593	314894.08	3899662.90	NESTED	98.99
594	314994.08	3899662.90	NESTED	98.98
595	315094.08	3899662.90	NESTED	98.97
596	315194.08	3899662.90	NESTED	98.95
597	315294.08	3899662.90	NESTED	98.94
598	315394.08	3899662.90	NESTED	98.89
599	315494.08	3899662.90	NESTED	98.83
600	315594.08	3899662.90	NESTED	98.79

601	315694.08	3899662.90	NESTED	98.80
602	315794.08	3899662.90	NESTED	98.82
603	315894.08	3899662.90	NESTED	98.83
604	315994.08	3899662.90	NESTED	98.89
605	316094.08	3899662.90	NESTED	98.93
606	316194.08	3899662.90	NESTED	99.05
607	316294.08	3899662.90	NESTED	99.15
608	316394.08	3899662.90	NESTED	99.07
609	313194.08	3899762.90	NESTED	99.56
610	313294.08	3899762.90	NESTED	99.48
611	313394.08	3899762.90	NESTED	99.40
612	313494.08	3899762.90	NESTED	99.34
613	313594.08	3899762.90	NESTED	99.29
614	313694.08	3899762.90	NESTED	99.23
615	313794.08	3899762.90	NESTED	99.24
616	313894.08	3899762.90	NESTED	99.28
617	313994.08	3899762.90	NESTED	99.35
618	314094.08	3899762.90	NESTED	99.43
619	314194.08	3899762.90	NESTED	99.53
620	314294.08	3899762.90	NESTED	99.65
621	314394.08	3899762.90	NESTED	99.76
622	314494.08	3899762.90	NESTED	99.60
623	314594.08	3899762.90	NESTED	99.36
624	314694.08	3899762.90	NESTED	99.23
625	314794.08	3899762.90	NESTED	99.20
626	314894.08	3899762.90	NESTED	99.18
627	314994.08	3899762.90	NESTED	99.17
628	315094.08	3899762.90	NESTED	99.18
629	315194.08	3899762.90	NESTED	99.16
630	315294.08	3899762.90	NESTED	99.14
631	315394.08	3899762.90	NESTED	99.11
632	315494.08	3899762.90	NESTED	99.08
633	315594.08	3899762.90	NESTED	99.07
634	315694.08	3899762.90	NESTED	99.07
635	315794.08	3899762.90	NESTED	99.07
636	315894.08	3899762.90	NESTED	99.06
637	315994.08	3899762.90	NESTED	99.06
638	316094.08	3899762.90	NESTED	99.05

639	316194.08	3899762.90	NESTED	99.04
640	316294.08	3899762.90	NESTED	99.04
641	316394.08	3899762.90	NESTED	99.05
642	313194.08	3899862.90	NESTED	99.73
643	313294.08	3899862.90	NESTED	99.57
644	313394.08	3899862.90	NESTED	99.63
645	313494.08	3899862.90	NESTED	99.60
646	313594.08	3899862.90	NESTED	99.47
647	313694.08	3899862.90	NESTED	99.36
648	313794.08	3899862.90	NESTED	99.36
649	313894.08	3899862.90	NESTED	99.43
650	313994.08	3899862.90	NESTED	99.50
651	314094.08	3899862.90	NESTED	99.60
652	314194.08	3899862.90	NESTED	99.71
653	314294.08	3899862.90	NESTED	99.80
654	314394.08	3899862.90	NESTED	99.85
655	314494.08	3899862.90	NESTED	99.83
656	314594.08	3899862.90	NESTED	99.65
657	314694.08	3899862.90	NESTED	99.52
658	314794.08	3899862.90	NESTED	99.46
659	314894.08	3899862.90	NESTED	99.40
660	314994.08	3899862.90	NESTED	99.36
661	315094.08	3899862.90	NESTED	99.37
662	315194.08	3899862.90	NESTED	99.37
663	315294.08	3899862.90	NESTED	99.34
664	315394.08	3899862.90	NESTED	99.29
665	315494.08	3899862.90	NESTED	99.28
666	315594.08	3899862.90	NESTED	99.29
667	315694.08	3899862.90	NESTED	99.30
668	315794.08	3899862.90	NESTED	99.28
669	315894.08	3899862.90	NESTED	99.27
670	315994.08	3899862.90	NESTED	99.27
671	316094.08	3899862.90	NESTED	99.27
672	316194.08	3899862.90	NESTED	99.29
673	316294.08	3899862.90	NESTED	99.27
674	316394.08	3899862.90	NESTED	99.27
675	313194.08	3899962.90	NESTED	99.73
676	313294.08	3899962.90	NESTED	99.58

677	313394.08	3899962.90	NESTED	99.74
678	313494.08	3899962.90	NESTED	99.72
679	313594.08	3899962.90	NESTED	99.54
680	313694.08	3899962.90	NESTED	99.45
681	313794.08	3899962.90	NESTED	99.49
682	313894.08	3899962.90	NESTED	99.57
683	313994.08	3899962.90	NESTED	99.65
684	314094.08	3899962.90	NESTED	99.75
685	314194.08	3899962.90	NESTED	99.85
686	314294.08	3899962.90	NESTED	99.95
687	314394.08	3899962.90	NESTED	100.01
688	314494.08	3899962.90	NESTED	100.00
689	314594.08	3899962.90	NESTED	99.92
690	314694.08	3899962.90	NESTED	99.83
691	314794.08	3899962.90	NESTED	99.78
692	314894.08	3899962.90	NESTED	99.70
693	314994.08	3899962.90	NESTED	99.64
694	315094.08	3899962.90	NESTED	99.60
695	315194.08	3899962.90	NESTED	99.55
696	315294.08	3899962.90	NESTED	99.52
697	315394.08	3899962.90	NESTED	99.46
698	315494.08	3899962.90	NESTED	99.48
699	315594.08	3899962.90	NESTED	99.49
700	315694.08	3899962.90	NESTED	99.49
701	315794.08	3899962.90	NESTED	99.49
702	315894.08	3899962.90	NESTED	99.49
703	315994.08	3899962.90	NESTED	99.46
704	316094.08	3899962.90	NESTED	99.45
705	316194.08	3899962.90	NESTED	99.57
706	316294.08	3899962.90	NESTED	99.62
707	316394.08	3899962.90	NESTED	99.53
708	313194.08	3900062.90	NESTED	99.72
709	313294.08	3900062.90	NESTED	99.68
710	313394.08	3900062.90	NESTED	99.81
711	313494.08	3900062.90	NESTED	99.81
712	313594.08	3900062.90	NESTED	99.61
713	313694.08	3900062.90	NESTED	99.54
714	313794.08	3900062.90	NESTED	99.62

715	313894.08	3900062.90	NESTED	99.71
716	313994.08	3900062.90	NESTED	99.80
717	314094.08	3900062.90	NESTED	99.88
718	314194.08	3900062.90	NESTED	99.99
719	314294.08	3900062.90	NESTED	100.09
720	314394.08	3900062.90	NESTED	100.16
721	314494.08	3900062.90	NESTED	100.18
722	314594.08	3900062.90	NESTED	100.13
723	314694.08	3900062.90	NESTED	100.08
724	314794.08	3900062.90	NESTED	100.06
725	314894.08	3900062.90	NESTED	100.03
726	314994.08	3900062.90	NESTED	99.98
727	315094.08	3900062.90	NESTED	99.92
728	315194.08	3900062.90	NESTED	99.80
729	315294.08	3900062.90	NESTED	99.67
730	315394.08	3900062.90	NESTED	99.67
731	315494.08	3900062.90	NESTED	99.67
732	315594.08	3900062.90	NESTED	99.68
733	315694.08	3900062.90	NESTED	99.68
734	315794.08	3900062.90	NESTED	99.68
735	315894.08	3900062.90	NESTED	99.68
736	315994.08	3900062.90	NESTED	99.68
737	316094.08	3900062.90	NESTED	99.58
738	316194.08	3900062.90	NESTED	99.67
739	316294.08	3900062.90	NESTED	99.76
740	316394.08	3900062.90	NESTED	99.62
741	313194.08	3900162.90	NESTED	99.72
742	313294.08	3900162.90	NESTED	99.86
743	313394.08	3900162.90	NESTED	99.96
744	313494.08	3900162.90	NESTED	99.85
745	313594.08	3900162.90	NESTED	99.66
746	313694.08	3900162.90	NESTED	99.65
747	313794.08	3900162.90	NESTED	99.75
748	313894.08	3900162.90	NESTED	99.85
749	313994.08	3900162.90	NESTED	99.95
750	314094.08	3900162.90	NESTED	100.04
751	314194.08	3900162.90	NESTED	100.13
752	314294.08	3900162.90	NESTED	100.21

753	314394.08	3900162.90	NESTED	100.30
754	314494.08	3900162.90	NESTED	100.35
755	314594.08	3900162.90	NESTED	100.37
756	314694.08	3900162.90	NESTED	100.35
757	314794.08	3900162.90	NESTED	100.33
758	314894.08	3900162.90	NESTED	100.32
759	314994.08	3900162.90	NESTED	100.29
760	315094.08	3900162.90	NESTED	100.19
761	315194.08	3900162.90	NESTED	100.02
762	315294.08	3900162.90	NESTED	99.91
763	315394.08	3900162.90	NESTED	99.89
764	315494.08	3900162.90	NESTED	99.88
765	315594.08	3900162.90	NESTED	99.87
766	315694.08	3900162.90	NESTED	99.87
767	315794.08	3900162.90	NESTED	99.84
768	315894.08	3900162.90	NESTED	99.86
769	315994.08	3900162.90	NESTED	99.79
770	316094.08	3900162.90	NESTED	99.73
771	316194.08	3900162.90	NESTED	99.73
772	316294.08	3900162.90	NESTED	99.83
773	316394.08	3900162.90	NESTED	99.69
774	313194.08	3900262.90	NESTED	99.75
775	313294.08	3900262.90	NESTED	100.22
776	313394.08	3900262.90	NESTED	100.10
777	313494.08	3900262.90	NESTED	99.93
778	313594.08	3900262.90	NESTED	99.78
779	313694.08	3900262.90	NESTED	99.80
780	313794.08	3900262.90	NESTED	99.89
781	313894.08	3900262.90	NESTED	99.99
782	313994.08	3900262.90	NESTED	100.09
783	314094.08	3900262.90	NESTED	100.19
784	314194.08	3900262.90	NESTED	100.28
785	314294.08	3900262.90	NESTED	100.37
786	314394.08	3900262.90	NESTED	100.44
787	314494.08	3900262.90	NESTED	100.51
788	314594.08	3900262.90	NESTED	100.59
789	314694.08	3900262.90	NESTED	100.63
790	314794.08	3900262.90	NESTED	100.61

791	314894.08	3900262.90	NESTED	100.59
792	314994.08	3900262.90	NESTED	100.53
793	315094.08	3900262.90	NESTED	100.44
794	315194.08	3900262.90	NESTED	100.33
795	315294.08	3900262.90	NESTED	100.21
796	315394.08	3900262.90	NESTED	100.13
797	315494.08	3900262.90	NESTED	100.07
798	315594.08	3900262.90	NESTED	100.06
799	315694.08	3900262.90	NESTED	100.02
800	315794.08	3900262.90	NESTED	100.02
801	315894.08	3900262.90	NESTED	100.00
802	315994.08	3900262.90	NESTED	99.93
803	316094.08	3900262.90	NESTED	99.86
804	316194.08	3900262.90	NESTED	99.73
805	316294.08	3900262.90	NESTED	100.16
806	316394.08	3900262.90	NESTED	99.64
807	313194.08	3900362.90	NESTED	101.27
808	313294.08	3900362.90	NESTED	100.46
809	313394.08	3900362.90	NESTED	100.16
810	313494.08	3900362.90	NESTED	100.07
811	313594.08	3900362.90	NESTED	100.01
812	313694.08	3900362.90	NESTED	100.00
813	313794.08	3900362.90	NESTED	100.07
814	313894.08	3900362.90	NESTED	100.15
815	313994.08	3900362.90	NESTED	100.24
816	314094.08	3900362.90	NESTED	100.33
817	315494.08	3900362.90	NESTED	100.28
818	315594.08	3900362.90	NESTED	100.23
819	315694.08	3900362.90	NESTED	100.20
820	315794.08	3900362.90	NESTED	100.16
821	315894.08	3900362.90	NESTED	100.12
822	315994.08	3900362.90	NESTED	100.03
823	316094.08	3900362.90	NESTED	99.88
824	316194.08	3900362.90	NESTED	100.17
825	316294.08	3900362.90	NESTED	100.58
826	316394.08	3900362.90	NESTED	99.68
827	313194.08	3900462.90	NESTED	100.45
828	313294.08	3900462.90	NESTED	100.33

829	313394.08	3900462.90	NESTED	100.22
830	313494.08	3900462.90	NESTED	100.20
831	313594.08	3900462.90	NESTED	100.18
832	313694.08	3900462.90	NESTED	100.18
833	313794.08	3900462.90	NESTED	100.22
834	313894.08	3900462.90	NESTED	100.29
835	313994.08	3900462.90	NESTED	100.38
836	314094.08	3900462.90	NESTED	100.46
837	315494.08	3900462.90	NESTED	100.49
838	315594.08	3900462.90	NESTED	100.40
839	315694.08	3900462.90	NESTED	100.35
840	315794.08	3900462.90	NESTED	100.29
841	315894.08	3900462.90	NESTED	100.24
842	315994.08	3900462.90	NESTED	100.13
843	316094.08	3900462.90	NESTED	99.90
844	316194.08	3900462.90	NESTED	100.44
845	316294.08	3900462.90	NESTED	100.78
846	316394.08	3900462.90	NESTED	99.72
847	313194.08	3900562.90	NESTED	100.25
848	313294.08	3900562.90	NESTED	100.32
849	313394.08	3900562.90	NESTED	100.36
850	313494.08	3900562.90	NESTED	100.37
851	313594.08	3900562.90	NESTED	100.35
852	313694.08	3900562.90	NESTED	100.36
853	313794.08	3900562.90	NESTED	100.41
854	313894.08	3900562.90	NESTED	100.48
855	313994.08	3900562.90	NESTED	100.55
856	314094.08	3900562.90	NESTED	100.61
857	315494.08	3900562.90	NESTED	100.67
858	315594.08	3900562.90	NESTED	100.56
859	315694.08	3900562.90	NESTED	100.47
860	315794.08	3900562.90	NESTED	100.42
861	315894.08	3900562.90	NESTED	100.34
862	315994.08	3900562.90	NESTED	100.24
863	316094.08	3900562.90	RESIDENT	99.97
864	316194.08	3900562.90	NESTED	99.81
865	316294.08	3900562.90	NESTED	100.96
866	316394.08	3900562.90	NESTED	99.75

867	313194.08	3900662.90	NESTED	100.39
868	313294.08	3900662.90	NESTED	100.48
869	313394.08	3900662.90	NESTED	100.52
870	313494.08	3900662.90	NESTED	100.53
871	313594.08	3900662.90	NESTED	100.51
872	313694.08	3900662.90	NESTED	100.55
873	313794.08	3900662.90	NESTED	100.59
874	313894.08	3900662.90	NESTED	100.64
875	313994.08	3900662.90	NESTED	100.68
876	314094.08	3900662.90	NESTED	100.73
877	315494.08	3900662.90	NESTED	100.84
878	315594.08	3900662.90	NESTED	100.73
879	315694.08	3900662.90	NESTED	100.61
880	315794.08	3900662.90	NESTED	100.50
881	315894.08	3900662.90	NESTED	100.41
882	315994.08	3900662.90	NESTED	100.30
883	316094.08	3900662.90	NESTED	100.13
884	316194.08	3900662.90	NESTED	100.85
885	316294.08	3900662.90	NESTED	100.97
886	316394.08	3900662.90	NESTED	99.77
887	313194.08	3900762.90	NESTED	100.65
888	313294.08	3900762.90	NESTED	100.67
889	313394.08	3900762.90	NESTED	100.68
890	313494.08	3900762.90	NESTED	100.67
891	313594.08	3900762.90	NESTED	100.67
892	313694.08	3900762.90	NESTED	100.69
893	313794.08	3900762.90	NESTED	100.73
894	313894.08	3900762.90	NESTED	100.77
895	313994.08	3900762.90	NESTED	100.80
896	314094.08	3900762.90	NESTED	100.87
897	315494.08	3900762.90	NESTED	100.99
898	315594.08	3900762.90	NESTED	100.86
899	315694.08	3900762.90	NESTED	100.71
900	315794.08	3900762.90	NESTED	100.58
901	315894.08	3900762.90	NESTED	100.46
902	315994.08	3900762.90	NESTED	100.37
903	316094.08	3900762.90	NESTED	100.50
904	316194.08	3900762.90	NESTED	101.20

905	316294.08	3900762.90	NESTED	100.73
906	316394.08	3900762.90	NESTED	99.77
907	313194.08	3900862.90	NESTED	100.87
908	313294.08	3900862.90	NESTED	100.85
909	313394.08	3900862.90	NESTED	100.84
910	313494.08	3900862.90	NESTED	100.81
911	313594.08	3900862.90	NESTED	100.79
912	313694.08	3900862.90	NESTED	100.80
913	313794.08	3900862.90	NESTED	100.82
914	313894.08	3900862.90	NESTED	100.87
915	313994.08	3900862.90	NESTED	100.92
916	314094.08	3900862.90	NESTED	101.00
917	315494.08	3900862.90	NESTED	101.08
918	315594.08	3900862.90	NESTED	100.92
919	315694.08	3900862.90	NESTED	100.76
920	315794.08	3900862.90	NESTED	100.64
921	315894.08	3900862.90	NESTED	100.55
922	315994.08	3900862.90	NESTED	100.45
923	316094.08	3900862.90	NESTED	100.42
924	316194.08	3900862.90	NESTED	100.53
925	316294.08	3900862.90	NESTED	100.22
926	316394.08	3900862.90	NESTED	99.81
927	313194.08	3900962.90	NESTED	101.03
928	313294.08	3900962.90	NESTED	101.01
929	313394.08	3900962.90	NESTED	100.97
930	313494.08	3900962.90	NESTED	100.93
931	313594.08	3900962.90	NESTED	100.90
932	313694.08	3900962.90	NESTED	100.91
933	313794.08	3900962.90	NESTED	100.94
934	313894.08	3900962.90	NESTED	100.98
935	313994.08	3900962.90	NESTED	101.05
936	314094.08	3900962.90	NESTED	101.12
937	315494.08	3900962.90	NESTED	101.14
938	315594.08	3900962.90	NESTED	100.96
939	315694.08	3900962.90	NESTED	100.81
940	315794.08	3900962.90	NESTED	100.71
941	315894.08	3900962.90	NESTED	100.66
942	315994.08	3900962.90	NESTED	100.57

943	316094.08	3900962.90	NESTED	100.37
944	316194.08	3900962.90	RESIDENT	100.05
945	316294.08	3900962.90	RESIDENT	99.77
946	316394.08	3900962.90	NESTED	99.98
947	313194.08	3901062.90	NESTED	101.21
948	313294.08	3901062.90	NESTED	101.15
949	313394.08	3901062.90	NESTED	101.10
950	313494.08	3901062.90	NESTED	101.04
951	313594.08	3901062.90	NESTED	101.00
952	313694.08	3901062.90	NESTED	101.00
953	313794.08	3901062.90	NESTED	101.05
954	313894.08	3901062.90	NESTED	101.11
955	313994.08	3901062.90	NESTED	101.18
956	314094.08	3901062.90	NESTED	101.25
957	315494.08	3901062.90	NESTED	101.21
958	315594.08	3901062.90	NESTED	101.03
959	315694.08	3901062.90	NESTED	100.88
960	315794.08	3901062.90	NESTED	100.81
961	315894.08	3901062.90	NESTED	100.80
962	315994.08	3901062.90	NESTED	100.78
963	316094.08	3901062.90	NESTED	100.59
964	316194.08	3901062.90	RESIDENT	100.27
965	316294.08	3901062.90	NESTED	99.78
966	316394.08	3901062.90	NESTED	100.14
967	313194.08	3901162.90	NESTED	101.35
968	313294.08	3901162.90	NESTED	101.29
969	313394.08	3901162.90	NESTED	101.22
970	313494.08	3901162.90	NESTED	101.17
971	313594.08	3901162.90	NESTED	101.11
972	313694.08	3901162.90	NESTED	101.11
973	313794.08	3901162.90	NESTED	101.17
974	313894.08	3901162.90	NESTED	101.23
975	313994.08	3901162.90	NESTED	101.30
976	314094.08	3901162.90	NESTED	101.36
977	315494.08	3901162.90	NESTED	101.27
978	315594.08	3901162.90	NESTED	101.11
979	315694.08	3901162.90	NESTED	100.97
980	315794.08	3901162.90	NESTED	100.92

981	315894.08	3901162.90	NESTED	100.95
982	315994.08	3901162.90	NESTED	101.08
983	316094.08	3901162.90	NESTED	101.10
984	316194.08	3901162.90	NESTED	100.86
985	316294.08	3901162.90	RESIDENT	100.61
986	316394.08	3901162.90	NESTED	100.80
987	313194.08	3901262.90	NESTED	101.50
988	313294.08	3901262.90	NESTED	101.47
989	313394.08	3901262.90	NESTED	101.40
990	313494.08	3901262.90	NESTED	101.32
991	313594.08	3901262.90	NESTED	101.24
992	313694.08	3901262.90	NESTED	101.24
993	313794.08	3901262.90	NESTED	101.29
994	313894.08	3901262.90	NESTED	101.36
995	313994.08	3901262.90	NESTED	101.43
996	314094.08	3901262.90	RESIDENT	101.48
997	315494.08	3901262.90	NESTED	101.32
998	315594.08	3901262.90	NESTED	101.15
999	315694.08	3901262.90	NESTED	101.02
1,000	315794.08	3901262.90	NESTED	101.00
1,001	315894.08	3901262.90	NESTED	101.12
1,002	315994.08	3901262.90	NESTED	101.23
1,003	316094.08	3901262.90	NESTED	101.28
1,004	316194.08	3901262.90	NESTED	101.27
1,005	316294.08	3901262.90	NESTED	101.28
1,006	316394.08	3901262.90	NESTED	101.28
1,007	313194.08	3901362.90	NESTED	101.67
1,008	313294.08	3901362.90	NESTED	101.72
1,009	313394.08	3901362.90	NESTED	101.69
1,010	313494.08	3901362.90	NESTED	101.56
1,011	313594.08	3901362.90	NESTED	101.42
1,012	313694.08	3901362.90	NESTED	101.35
1,013	313794.08	3901362.90	NESTED	101.42
1,014	313894.08	3901362.90	NESTED	101.48
1,015	313994.08	3901362.90	NESTED	101.53
1,016	314094.08	3901362.90	NESTED	101.58
1,017	315494.08	3901362.90	NESTED	101.32
1,018	315594.08	3901362.90	NESTED	101.21

1,019	315694.08	3901362.90	NESTED	101.09
1,020	315794.08	3901362.90	NESTED	101.11
1,021	315894.08	3901362.90	NESTED	101.22
1,022	315994.08	3901362.90	NESTED	101.33
1,023	316094.08	3901362.90	NESTED	101.39
1,024	316194.08	3901362.90	NESTED	101.42
1,025	316294.08	3901362.90	NESTED	101.42
1,026	316394.08	3901362.90	NESTED	101.43
1,027	313194.08	3901462.90	NESTED	101.85
1,028	313294.08	3901462.90	NESTED	101.89
1,029	313394.08	3901462.90	NESTED	101.88
1,030	313494.08	3901462.90	NESTED	101.76
1,031	313594.08	3901462.90	NESTED	101.63
1,032	313694.08	3901462.90	NESTED	101.58
1,033	313794.08	3901462.90	NESTED	101.59
1,034	313894.08	3901462.90	NESTED	101.63
1,035	313994.08	3901462.90	NESTED	101.67
1,036	314094.08	3901462.90	NESTED	101.72
1,037	315494.08	3901462.90	NESTED	101.39
1,038	315594.08	3901462.90	NESTED	101.28
1,039	315694.08	3901462.90	NESTED	101.17
1,040	315794.08	3901462.90	NESTED	101.28
1,041	315894.08	3901462.90	NESTED	101.33
1,042	315994.08	3901462.90	NESTED	101.44
1,043	316094.08	3901462.90	NESTED	101.53
1,044	316194.08	3901462.90	NESTED	101.56
1,045	316294.08	3901462.90	NESTED	101.56
1,046	316394.08	3901462.90	NESTED	101.57
1,047	313194.08	3901562.90	NESTED	102.02
1,048	313294.08	3901562.90	NESTED	102.04
1,049	313394.08	3901562.90	NESTED	102.04
1,050	313494.08	3901562.90	NESTED	101.98
1,051	313594.08	3901562.90	NESTED	101.89
1,052	313694.08	3901562.90	NESTED	101.82
1,053	313794.08	3901562.90	NESTED	101.80
1,054	313894.08	3901562.90	NESTED	101.80
1,055	313994.08	3901562.90	NESTED	101.82
1,056	314094.08	3901562.90	NESTED	101.85

1,057	315494.08	3901562.90	NESTED	101.51
1,058	315594.08	3901562.90	NESTED	101.39
1,059	315694.08	3901562.90	NESTED	101.31
1,060	315794.08	3901562.90	NESTED	101.40
1,061	315894.08	3901562.90	NESTED	101.49
1,062	315994.08	3901562.90	NESTED	101.57
1,063	316094.08	3901562.90	NESTED	101.63
1,064	316194.08	3901562.90	NESTED	101.68
1,065	316294.08	3901562.90	NESTED	101.70
1,066	316394.08	3901562.90	NESTED	101.71
1,067	313194.08	3901662.90	NESTED	102.18
1,068	313294.08	3901662.90	NESTED	102.19
1,069	313394.08	3901662.90	NESTED	102.19
1,070	313494.08	3901662.90	NESTED	102.15
1,071	313594.08	3901662.90	NESTED	102.10
1,072	313694.08	3901662.90	NESTED	102.04
1,073	313794.08	3901662.90	NESTED	101.99
1,074	313894.08	3901662.90	NESTED	101.99
1,075	313994.08	3901662.90	NESTED	101.99
1,076	314094.08	3901662.90	NESTED	102.01
1,077	314194.08	3901662.90	NESTED	102.04
1,078	314294.08	3901662.90	NESTED	102.05
1,079	314394.08	3901662.90	NESTED	102.09
1,080	314494.08	3901662.90	NESTED	102.11
1,081	314594.08	3901662.90	NESTED	102.14
1,082	314694.08	3901662.90	NESTED	102.15
1,083	314794.08	3901662.90	NESTED	102.13
1,084	314894.08	3901662.90	NESTED	102.11
1,085	314994.08	3901662.90	NESTED	102.06
1,086	315094.08	3901662.90	NESTED	102.01
1,087	315194.08	3901662.90	NESTED	101.93
1,088	315294.08	3901662.90	NESTED	101.86
1,089	315394.08	3901662.90	NESTED	101.77
1,090	315494.08	3901662.90	NESTED	101.68
1,091	315594.08	3901662.90	NESTED	101.59
1,092	315694.08	3901662.90	NESTED	101.56
1,093	315794.08	3901662.90	NESTED	101.59
1,094	315894.08	3901662.90	NESTED	101.65

1,095	315994.08	3901662.90	NESTED	101.70
1,096	316094.08	3901662.90	NESTED	101.75
1,097	316194.08	3901662.90	NESTED	101.80
1,098	316294.08	3901662.90	NESTED	101.84
1,099	316394.08	3901662.90	NESTED	101.85
1,100	313194.08	3901762.90	NESTED	102.36
1,101	313294.08	3901762.90	NESTED	102.34
1,102	313394.08	3901762.90	NESTED	102.34
1,103	313494.08	3901762.90	NESTED	102.30
1,104	313594.08	3901762.90	NESTED	102.27
1,105	313694.08	3901762.90	NESTED	102.22
1,106	313794.08	3901762.90	NESTED	102.18
1,107	313894.08	3901762.90	NESTED	102.16
1,108	313994.08	3901762.90	NESTED	102.15
1,109	314094.08	3901762.90	NESTED	102.17
1,110	314194.08	3901762.90	NESTED	102.18
1,111	314294.08	3901762.90	NESTED	102.21
1,112	314394.08	3901762.90	NESTED	102.23
1,113	314494.08	3901762.90	NESTED	102.26
1,114	314594.08	3901762.90	NESTED	102.27
1,115	314694.08	3901762.90	NESTED	102.28
1,116	314794.08	3901762.90	NESTED	102.27
1,117	314894.08	3901762.90	NESTED	102.25
1,118	314994.08	3901762.90	NESTED	102.20
1,119	315094.08	3901762.90	NESTED	102.16
1,120	315194.08	3901762.90	NESTED	102.08
1,121	315294.08	3901762.90	NESTED	102.03
1,122	315394.08	3901762.90	NESTED	101.96
1,123	315494.08	3901762.90	NESTED	101.89
1,124	315594.08	3901762.90	NESTED	101.82
1,125	315694.08	3901762.90	NESTED	101.81
1,126	315794.08	3901762.90	NESTED	101.81
1,127	315894.08	3901762.90	NESTED	101.84
1,128	315994.08	3901762.90	NESTED	101.88
1,129	316094.08	3901762.90	NESTED	101.90
1,130	316194.08	3901762.90	NESTED	101.93
1,131	316294.08	3901762.90	NESTED	101.96
1,132	316394.08	3901762.90	NESTED	101.99

1,133	313194.08	3901862.90	NESTED	102.57
1,134	313294.08	3901862.90	NESTED	102.57
1,135	313394.08	3901862.90	NESTED	102.48
1,136	313494.08	3901862.90	NESTED	102.44
1,137	313594.08	3901862.90	NESTED	102.39
1,138	313694.08	3901862.90	NESTED	102.36
1,139	313794.08	3901862.90	NESTED	102.33
1,140	313894.08	3901862.90	NESTED	102.30
1,141	313994.08	3901862.90	NESTED	102.29
1,142	314094.08	3901862.90	NESTED	102.29
1,143	314194.08	3901862.90	NESTED	102.32
1,144	314294.08	3901862.90	NESTED	102.36
1,145	314394.08	3901862.90	NESTED	102.38
1,146	314494.08	3901862.90	NESTED	102.41
1,147	314594.08	3901862.90	NESTED	102.42
1,148	314694.08	3901862.90	NESTED	102.40
1,149	314794.08	3901862.90	NESTED	102.41
1,150	314894.08	3901862.90	NESTED	102.39
1,151	314994.08	3901862.90	NESTED	102.34
1,152	315094.08	3901862.90	NESTED	102.30
1,153	315194.08	3901862.90	NESTED	102.24
1,154	315294.08	3901862.90	NESTED	102.18
1,155	315394.08	3901862.90	NESTED	102.14
1,156	315494.08	3901862.90	NESTED	102.08
1,157	315594.08	3901862.90	NESTED	102.06
1,158	315694.08	3901862.90	NESTED	102.04
1,159	315794.08	3901862.90	NESTED	102.04
1,160	315894.08	3901862.90	NESTED	102.04
1,161	315994.08	3901862.90	NESTED	102.07
1,162	316094.08	3901862.90	NESTED	102.08
1,163	316194.08	3901862.90	NESTED	102.10
1,164	316294.08	3901862.90	NESTED	102.12
1,165	316394.08	3901862.90	NESTED	102.15
1,166	313194.08	3901962.90	NESTED	102.74
1,167	313294.08	3901962.90	NESTED	102.80
1,168	313394.08	3901962.90	NESTED	102.56
1,169	313494.08	3901962.90	NESTED	102.54
1,170	313594.08	3901962.90	NESTED	102.52

1,171	313694.08	3901962.90	NESTED	102.49
1,172	313794.08	3901962.90	NESTED	102.45
1,173	313894.08	3901962.90	NESTED	102.40
1,174	313994.08	3901962.90	NESTED	102.39
1,175	314094.08	3901962.90	NESTED	102.42
1,176	314194.08	3901962.90	NESTED	102.47
1,177	314294.08	3901962.90	NESTED	102.51
1,178	314394.08	3901962.90	NESTED	102.55
1,179	314494.08	3901962.90	NESTED	102.56
1,180	314594.08	3901962.90	NESTED	102.55
1,181	314694.08	3901962.90	NESTED	102.55
1,182	314794.08	3901962.90	NESTED	102.54
1,183	314894.08	3901962.90	NESTED	102.53
1,184	314994.08	3901962.90	NESTED	102.49
1,185	315094.08	3901962.90	NESTED	102.43
1,186	315194.08	3901962.90	NESTED	102.36
1,187	315294.08	3901962.90	NESTED	102.31
1,188	315394.08	3901962.90	NESTED	102.27
1,189	315494.08	3901962.90	NESTED	102.26
1,190	315594.08	3901962.90	NESTED	102.24
1,191	315694.08	3901962.90	NESTED	102.23
1,192	315794.08	3901962.90	NESTED	102.22
1,193	315894.08	3901962.90	NESTED	102.23
1,194	315994.08	3901962.90	NESTED	102.25
1,195	316094.08	3901962.90	NESTED	102.25
1,196	316194.08	3901962.90	NESTED	102.26
1,197	316294.08	3901962.90	NESTED	102.27
1,198	316394.08	3901962.90	NESTED	102.30
1,199	313194.08	3902062.90	NESTED	102.87
1,200	313294.08	3902062.90	NESTED	102.87
1,201	313394.08	3902062.90	NESTED	102.75
1,202	313494.08	3902062.90	NESTED	102.70
1,203	313594.08	3902062.90	NESTED	102.67
1,204	313694.08	3902062.90	NESTED	102.62
1,205	313794.08	3902062.90	NESTED	102.54
1,206	313894.08	3902062.90	NESTED	102.48
1,207	313994.08	3902062.90	NESTED	102.48
1,208	314094.08	3902062.90	NESTED	102.54

1,209	314194.08	3902062.90	NESTED	102.60
1,210	314294.08	3902062.90	NESTED	102.67
1,211	314394.08	3902062.90	NESTED	102.71
1,212	314494.08	3902062.90	NESTED	102.72
1,213	314594.08	3902062.90	NESTED	102.68
1,214	314694.08	3902062.90	NESTED	102.69
1,215	314794.08	3902062.90	NESTED	102.70
1,216	314894.08	3902062.90	NESTED	102.68
1,217	314994.08	3902062.90	NESTED	102.62
1,218	315094.08	3902062.90	NESTED	102.55
1,219	315194.08	3902062.90	NESTED	102.49
1,220	315294.08	3902062.90	NESTED	102.42
1,221	315394.08	3902062.90	NESTED	102.41
1,222	315494.08	3902062.90	NESTED	102.40
1,223	315594.08	3902062.90	NESTED	102.38
1,224	315694.08	3902062.90	NESTED	102.38
1,225	315794.08	3902062.90	NESTED	102.39
1,226	315894.08	3902062.90	NESTED	102.39
1,227	315994.08	3902062.90	NESTED	102.41
1,228	316094.08	3902062.90	NESTED	102.41
1,229	316194.08	3902062.90	NESTED	102.42
1,230	316294.08	3902062.90	NESTED	102.44
1,231	316394.08	3902062.90	NESTED	102.46
1,232	313194.08	3902162.90	NESTED	103.00
1,233	313294.08	3902162.90	NESTED	102.95
1,234	313394.08	3902162.90	NESTED	102.88
1,235	313494.08	3902162.90	NESTED	102.86
1,236	313594.08	3902162.90	NESTED	102.82
1,237	313694.08	3902162.90	NESTED	102.72
1,238	313794.08	3902162.90	NESTED	102.61
1,239	313894.08	3902162.90	NESTED	102.57
1,240	313994.08	3902162.90	NESTED	102.57
1,241	314094.08	3902162.90	NESTED	102.63
1,242	314194.08	3902162.90	NESTED	102.72
1,243	314294.08	3902162.90	NESTED	102.80
1,244	314394.08	3902162.90	NESTED	102.87
1,245	314494.08	3902162.90	NESTED	102.86
1,246	314594.08	3902162.90	NESTED	102.85

1,247	314694.08	3902162.90	NESTED	102.85
1,248	314794.08	3902162.90	NESTED	102.85
1,249	314894.08	3902162.90	NESTED	102.84
1,250	314994.08	3902162.90	NESTED	102.75
1,251	315094.08	3902162.90	NESTED	102.68
1,252	315194.08	3902162.90	NESTED	102.60
1,253	315294.08	3902162.90	NESTED	102.56
1,254	315394.08	3902162.90	NESTED	102.54
1,255	315494.08	3902162.90	NESTED	102.53
1,256	315594.08	3902162.90	NESTED	102.53
1,257	315694.08	3902162.90	NESTED	102.52
1,258	315794.08	3902162.90	NESTED	102.54
1,259	315894.08	3902162.90	NESTED	102.55
1,260	315994.08	3902162.90	NESTED	102.54
1,261	316094.08	3902162.90	NESTED	102.57
1,262	316194.08	3902162.90	NESTED	102.58
1,263	316294.08	3902162.90	NESTED	102.60
1,264	316394.08	3902162.90	NESTED	102.61
1,265	313194.08	3902262.90	NESTED	103.12
1,266	313294.08	3902262.90	NESTED	103.08
1,267	313394.08	3902262.90	NESTED	103.06
1,268	313494.08	3902262.90	NESTED	103.02
1,269	313594.08	3902262.90	NESTED	102.94
1,270	313694.08	3902262.90	NESTED	102.81
1,271	313794.08	3902262.90	NESTED	102.72
1,272	313894.08	3902262.90	NESTED	102.64
1,273	313994.08	3902262.90	NESTED	102.64
1,274	314094.08	3902262.90	NESTED	102.71
1,275	314194.08	3902262.90	NESTED	102.84
1,276	314294.08	3902262.90	NESTED	102.95
1,277	314394.08	3902262.90	NESTED	103.02
1,278	314494.08	3902262.90	NESTED	103.04
1,279	314594.08	3902262.90	NESTED	103.03
1,280	314694.08	3902262.90	NESTED	103.03
1,281	314794.08	3902262.90	NESTED	103.02
1,282	314894.08	3902262.90	NESTED	102.99
1,283	314994.08	3902262.90	NESTED	102.91
1,284	315094.08	3902262.90	NESTED	102.82

1,285	315194.08	3902262.90	NESTED	102.73
1,286	315294.08	3902262.90	NESTED	102.67
1,287	315394.08	3902262.90	NESTED	102.67
1,288	315494.08	3902262.90	NESTED	102.67
1,289	315594.08	3902262.90	NESTED	102.66
1,290	315694.08	3902262.90	NESTED	102.67
1,291	315794.08	3902262.90	NESTED	102.69
1,292	315894.08	3902262.90	NESTED	102.70
1,293	315994.08	3902262.90	NESTED	102.71
1,294	316094.08	3902262.90	NESTED	102.70
1,295	316194.08	3902262.90	NESTED	102.75
1,296	316294.08	3902262.90	NESTED	102.76
1,297	316394.08	3902262.90	NESTED	102.77
1,298	313194.08	3902362.90	NESTED	103.25
1,299	313294.08	3902362.90	NESTED	103.22
1,300	313394.08	3902362.90	NESTED	103.21
1,301	313494.08	3902362.90	NESTED	103.16
1,302	313594.08	3902362.90	NESTED	103.07
1,303	313694.08	3902362.90	NESTED	102.98
1,304	313794.08	3902362.90	NESTED	102.84
1,305	313894.08	3902362.90	NESTED	102.72
1,306	313994.08	3902362.90	NESTED	102.71
1,307	314094.08	3902362.90	NESTED	102.80
1,308	314194.08	3902362.90	NESTED	102.97
1,309	314294.08	3902362.90	NESTED	103.10
1,310	314394.08	3902362.90	NESTED	103.17
1,311	314494.08	3902362.90	NESTED	103.21
1,312	314594.08	3902362.90	NESTED	103.22
1,313	314694.08	3902362.90	NESTED	103.20
1,314	314794.08	3902362.90	NESTED	103.18
1,315	314894.08	3902362.90	NESTED	103.14
1,316	314994.08	3902362.90	NESTED	103.07
1,317	315094.08	3902362.90	NESTED	102.99
1,318	315194.08	3902362.90	NESTED	102.90
1,319	315294.08	3902362.90	NESTED	102.82
1,320	315394.08	3902362.90	NESTED	102.82
1,321	315494.08	3902362.90	NESTED	102.83
1,322	315594.08	3902362.90	NESTED	102.84

1,323	315694.08	3902362.90	NESTED	102.86
1,324	315794.08	3902362.90	NESTED	102.86
1,325	315894.08	3902362.90	NESTED	102.87
1,326	315994.08	3902362.90	NESTED	102.90
1,327	316094.08	3902362.90	NESTED	102.78
1,328	316194.08	3902362.90	NESTED	102.95
1,329	316294.08	3902362.90	NESTED	102.94
1,330	316394.08	3902362.90	NESTED	102.93
1,331	313194.08	3902462.90	NESTED	103.39
1,332	313294.08	3902462.90	NESTED	103.37
1,333	313394.08	3902462.90	NESTED	103.35
1,334	313494.08	3902462.90	NESTED	103.30
1,335	313594.08	3902462.90	NESTED	103.24
1,336	313694.08	3902462.90	NESTED	103.13
1,337	313794.08	3902462.90	NESTED	103.01
1,338	313894.08	3902462.90	NESTED	102.88
1,339	313994.08	3902462.90	NESTED	102.88
1,340	314094.08	3902462.90	NESTED	103.01
1,341	314194.08	3902462.90	NESTED	103.15
1,342	314294.08	3902462.90	NESTED	103.26
1,343	314394.08	3902462.90	NESTED	103.34
1,344	314494.08	3902462.90	NESTED	103.38
1,345	314594.08	3902462.90	NESTED	103.39
1,346	314694.08	3902462.90	NESTED	103.37
1,347	314794.08	3902462.90	NESTED	103.34
1,348	314894.08	3902462.90	NESTED	103.30
1,349	314994.08	3902462.90	NESTED	103.23
1,350	315094.08	3902462.90	NESTED	103.16
1,351	315194.08	3902462.90	NESTED	103.10
1,352	315294.08	3902462.90	NESTED	103.06
1,353	315394.08	3902462.90	NESTED	103.06
1,354	315494.08	3902462.90	NESTED	103.08
1,355	315594.08	3902462.90	NESTED	103.08
1,356	315694.08	3902462.90	NESTED	103.11
1,357	315794.08	3902462.90	NESTED	103.10
1,358	315894.08	3902462.90	NESTED	103.09
1,359	315994.08	3902462.90	NESTED	103.01
1,360	316094.08	3902462.90	NESTED	102.80

1,361	316194.08	3902462.90	NESTED	103.05
1,362	316294.08	3902462.90	NESTED	103.14
1,363	316394.08	3902462.90	NESTED	103.15
1,364	313194.08	3902562.90	NESTED	103.57
1,365	313294.08	3902562.90	NESTED	103.59
1,366	313394.08	3902562.90	NESTED	103.58
1,367	313494.08	3902562.90	NESTED	103.53
1,368	313594.08	3902562.90	NESTED	103.46
1,369	313694.08	3902562.90	NESTED	103.39
1,370	313794.08	3902562.90	NESTED	103.33
1,371	313894.08	3902562.90	NESTED	103.25
1,372	313994.08	3902562.90	NESTED	103.26
1,373	314094.08	3902562.90	NESTED	103.34
1,374	314194.08	3902562.90	NESTED	103.45
1,375	314294.08	3902562.90	NESTED	103.54
1,376	314394.08	3902562.90	NESTED	103.61
1,377	314494.08	3902562.90	NESTED	103.63
1,378	314594.08	3902562.90	NESTED	103.62
1,379	314694.08	3902562.90	NESTED	103.60
1,380	314794.08	3902562.90	NESTED	103.54
1,381	314894.08	3902562.90	NESTED	103.48
1,382	314994.08	3902562.90	NESTED	103.43
1,383	315094.08	3902562.90	NESTED	103.38
1,384	315194.08	3902562.90	NESTED	103.34
1,385	315294.08	3902562.90	NESTED	103.33
1,386	315394.08	3902562.90	NESTED	103.33
1,387	315494.08	3902562.90	NESTED	103.34
1,388	315594.08	3902562.90	NESTED	103.35
1,389	315694.08	3902562.90	NESTED	103.37
1,390	315794.08	3902562.90	NESTED	103.35
1,391	315894.08	3902562.90	NESTED	103.30
1,392	315994.08	3902562.90	NESTED	103.19
1,393	316094.08	3902562.90	NESTED	103.11
1,394	316194.08	3902562.90	NESTED	103.23
1,395	316294.08	3902562.90	NESTED	103.35
1,396	316394.08	3902562.90	NESTED	103.38
1,397	314352.32	3900458.29	RESIDENT	100.68
1,398	316092.68	3901224.19	RESIDENT	101.24

1,399	316171.84	3901213.25	RESIDENT	101.14
1,400	316370.70	3901114.78	RESIDENT	100.23
1,401	316081.52	3901009.48	RESIDENT	100.47
1,402	316271.39	3901006.26	RESIDENT	99.89
1,403	316340.90	3900952.20	RESIDENT	99.77
1,404	316177.57	3900898.85	RESIDENT	100.26
1,405	316274.40	3900910.34	RESIDENT	99.99
1,406	316338.96	3900898.30	RESIDENT	99.77
1,407	316161.70	3900838.12	RESIDENT	100.64
1,408	316230.74	3900843.20	RESIDENT	101.25
1,409	316278.64	3900839.48	RESIDENT	100.70
1,410	316325.15	3900833.90	RESIDENT	99.99
1,411	316376.30	3900832.04	RESIDENT	99.77
1,412	316420.48	3900831.57	RESIDENT	99.77
1,413	316477.68	3900825.99	RESIDENT	99.78
1,414	316157.73	3900744.61	RESIDENT	100.95
1,415	316255.39	3900600.45	RESIDENT	101.50
1,416	316442.80	3900599.98	RESIDENT	99.85
1,417	316170.29	3900529.76	RESIDENT	99.79
1,418	316261.90	3900530.22	RESIDENT	101.41
1,419	316348.86	3900532.08	RESIDENT	99.81
1,420	316457.69	3900524.18	RESIDENT	99.85
1,421	314597.47	3902835.47	SCHOOL	104.31
1,422	314564.56	3901239.64	WORKER	101.63

Plant Boundary Receptors

Receptor Groups

Record Number	Group ID	Group Description
1	ARCREC	Discrete Cartesian Receptors for EVALFILE Output
2	NESTED	
3	RESIDENT	
4	SCHOOL	
5	WORKER	Off-Site Worker

Meteorology Pathway

AERMOD

Met Input Data

Surface Met Data

Filename: ..\..\41150044\Bakersfield_18-22.SFC
Format Type: Default AERMET format

Profile Met Data

Filename: ..\..\41150044\Bakersfield_18-22.PFL
Format Type: Default AERMET format

Wind Speed

☐ Wind Speeds are Vector Mean (Not Scalar Means)

Wind Direction

Rotation Adjustment [deg]:

Potential Temperature Profile

Base Elevation above MSL (for Primary Met Tower): 150.00 [m]

Meteorological Station Data

Stations	Station No.	Year	X Coordinate [m]	Y Coordinate [m]	Station Name
Surface		2018			KBFL
Upper Air		2018			OAKLAND/WSO AP

Data Period

Data Period to Process

Start Date: 1/1/2018 Start Hour: 1 End Date: 12/31/2022 End Hour: 24

Wind Speed Categories

Stability Category	Wind Speed [m/s]	Stability Category	Wind Speed [m/s]
A	1.54	D	8.23
B	3.09	E	10.8
C	5.14	F	No Upper Bound

Output Pathway

AERMOD

Tabular Printed Outputs

Short Term Averaging Period	RECTABLE Highest Values Table										MAXTABLE Maximum Values Table	DAYTABLE Daily Values Table
	1st	2nd	3rd	4th	5th	6th	7th	8th	9th	10th		
1	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐		No

Contour Plot Files (PLOTFILE)

Path for PLOTFILES: CONHRA.AD

Averaging Period	Source Group ID	High Value	File Name
Period	HAULROAD		HAUL_PE.PLT
Period	SITE		SITE_PE.PLT
1	HAULROAD	1st	HAUL_01.PLT
1	SITE	1st	SITE_01.PLT

Output File of US NAAQS

Path for US NAAQS: CONHRA.AD

NAAQS Auto-Generated Maximum Daily Files (MAXDAILY)

Active	Source Group ID	File Name
Yes	ALL	MAXDAILY_ALL_SO2.DAT
Yes	HAULROAD	MAXDAILY_HAULROAD_SO2.DAT
Yes	SITE	MAXDAILY_SITE_SO2.DAT

NAAQS Auto-Generated Maximum Daily By Year Files (MXDYBYYR)

Active	Source Group ID	File Name
Yes	ALL	MXDYBYYR_ALL_SO2.DAT
Yes	HAULROAD	MXDYBYYR_HAULROAD_SO2.DAT
Yes	SITE	MXDYBYYR_SITE_SO2.DAT

Project Construction Emissions for HRA Without Mitigation Measures

Annual Construction Emissions (pounds)

On-Site Emissions	PM_{10} (Exhaust)
3.1 Site Preparation (2024) - Unmitigated	**88.0**
3.3 Grading (2024) - Unmitigated	229.6
3.5 Building Construction (2024) - Unmitigated	55.3
3.7 Building Construction (2025) - Unmitigated	95.6
3.9 Paving On-Site (2025) - Unmitigated	19.6
3.11 Architectural Coating (2025) - Unmitigated	0.8
3.13 Off-Site Prep (2024) - Unmitigated	11.0
3.15 Paving Off-Site (2024) - Unmitigated	3.9
Total Onsite	**504**

Off-Site	PM_{10} (Exhaust)
Haul Trucks	14.3
Vendor Trucks	13.5
Total Offsite	**27.8**

Exhaust PM_{10}

Constuction Months	**16**	**months**
Construction Year	**1.33**	**year**
Variable Factor	**2.80**	**12 hour days**
On-Site Emissions	**504.00**	**lbs**
	378.0	**lbs/year**
Off-Site Emissions Near Project Site	**2.14**	**lbs/year**

CalEEMOD Modeling	Project Trips	One-Way Travel miles	Project VMT	PM_{10} (Exhaust) lb per VMT
Haul Trucks	11352	20.00	227,040	6.30E-05
Vendor Trucks	76828	10.60	814,377	1.66E-05

Off-Site AERMOD Input Adjustments

Applied in HARP2

Roadway Segment	Length (Miles)	Haul VMT w/in modeing impact area	Vendor VMT w/impact area	PM10 (Exhaust) Emission Rate (lbs)
Haul - Onsite to Houghton Road to SR-99	1.44	16323.2	110471.9	**2.86**
			PM10 Rate (lb/yr)	**2.14**

HARP Project Summary Report 11/8/2023 5:20:20 AM

PROJECT INFORMATION
HARP Version: 22118
Project Name: CONSTHRA
Project Output Directory: F:\Jobs\41150044HZ\HARP\CONSTHRA
HARP Database: NA

FACILITY INFORMATION
Origin
X (m):0
Y (m):0
Zone:1
No. of Sources:0
No. of Buildings:0

EMISSION INVENTORY
No. of Pollutants:2
No. of Background Pollutants:0

Emissions

ScrID	StkID	ProID	PolID	PolAbbrev	Multi	Annual Ems (lbs/yr)	MaxHr Ems (lbs/hr)	MWAF
SITE	0	0	9901	DieselExhPM	1	378	0	1
HAUL	0	0	9901	DieselExhPM	1	2.14	0	1

Background

PolID	PolAbbrev	Conc (ug/m^3)	MWAF

Ground level concentration files (\glc\)

9901MAXHR.txt
9901PER.txt

POLLUTANT HEALTH INFORMATION
Health Database: C:\HARP2\Tables\HEALTH17320.mdb
Health Table Version: HEALTH22013
Official: True

PolID	PolAbbrev	InhCancer	OralCancer	AcuteREL	InhChronicREL	OralChronicREL	InhChronic8HRREL
9901	DieselExhPM	1.1			5		

HARP2 - HRACalc (dated 22118) 4/16/2024 8:21:31 AM - Output Log

GLCs loaded successfully
Pollutants loaded successfully
Pathway receptors loaded successfully
****
RISK SCENARIO SETTINGS

Receptor Type: Resident
Scenario: Cancer
Calculation Method: Derived

****
EXPOSURE DURATION PARAMETERS FOR CANCER

Start Age: -0.25
Total Exposure Duration: 1.33

Exposure Duration Bin Distribution
3rd Trimester Bin: 0.25
0<2 Years Bin: 1.33
2<9 Years Bin: 0
2<16 Years Bin: 0
16<30 Years Bin: 0
16 to 70 Years Bin: 0

****
PATHWAYS ENABLED

NOTE: Inhalation is always enabled and used for all assessments. The remaining pathways are only used for cancer and noncancer chronic assessments.

Inhalation: True
Soil: False
Dermal: False
Mother's milk: False
Water: False
Fish: False
Homegrown crops: False
Beef: False
Dairy: False
Pig: False
Chicken: False
Egg: False

****
INHALATION

Daily breathing rate: LongTerm24HR

Worker Adjustment Factors
Worker adjustment factors enabled: NO

Fraction at time at home
3rd Trimester to 16 years: OFF
16 years to 70 years: OFF

****
TIER 2 SETTINGS

Tier2 adjustments were used in this assessment. Please see the input file for details.
Tier2 - What was changed: ED or start age changed|
Calculating cancer risk
Cancer risk breakdown by pollutant and receptor saved to: F:\Jobs\41150044HZ\HARP\CONSTHRA\hra\ResCancer1.33_CancerRisk.csv
Cancer risk total by receptor saved to: F:\Jobs\41150044HZ\HARP\CONSTHRA\hra\ResCancer1.33_CancerRiskSumByRec.csv
HRA ran successfully

*HARP - HRACalc v22118 4/16/2024 8:21:31 AM - Cancer Risk - Input File: F:\Jobs\41150044HZ\HARP\CONSTHRA\hra\ResCancer1.33_HRAInput.hra

REC	GRP	NETID	X	Y	CONC	POLID	POLABBREV	RISK_SUM	SCENARIO	INH_RISK
1397	ALL	RESIDENT	314352.3	3900458	0.009029	9901	DieselExhPM	2.10E-06	1.33YrCancerDerived_Inh	2.10E-06
996	ALL	RESIDENT	314094.1	3901263	0.006029	9901	DieselExhPM	1.40E-06	1.33YrCancerDerived_Inh	1.40E-06
570	ALL	SCHOOL	315894.1	3899563	0.003688	9901	DieselExhPM	8.56E-07	1.33YrCancerDerived_Inh	8.56E-07
863	ALL	RESIDENT	316094.1	3900563	0.002648	9901	DieselExhPM	6.15E-07	1.33YrCancerDerived_Inh	6.15E-07
1417	ALL	RESIDENT	316170.3	3900530	0.002407	9901	DieselExhPM	5.59E-07	1.33YrCancerDerived_Inh	5.59E-07
1414	ALL	RESIDENT	316157.7	3900745	0.002253	9901	DieselExhPM	5.23E-07	1.33YrCancerDerived_Inh	5.23E-07
1418	ALL	RESIDENT	316261.9	3900530	0.00214	9901	DieselExhPM	4.97E-07	1.33YrCancerDerived_Inh	4.97E-07
1407	ALL	RESIDENT	316161.7	3900838	0.002128	9901	DieselExhPM	4.94E-07	1.33YrCancerDerived_Inh	4.94E-07
1415	ALL	RESIDENT	316255.4	3900600	0.002105	9901	DieselExhPM	4.89E-07	1.33YrCancerDerived_Inh	4.89E-07
1401	ALL	RESIDENT	316081.5	3901009	0.002053	9901	DieselExhPM	4.76E-07	1.33YrCancerDerived_Inh	4.76E-07
1404	ALL	RESIDENT	316177.6	3900899	0.002002	9901	DieselExhPM	4.65E-07	1.33YrCancerDerived_Inh	4.65E-07
1398	ALL	RESIDENT	316092.7	3901224	0.001988	9901	DieselExhPM	4.61E-07	1.33YrCancerDerived_Inh	4.61E-07
1408	ALL	RESIDENT	316230.7	3900843	0.001961	9901	DieselExhPM	4.55E-07	1.33YrCancerDerived_Inh	4.55E-07
1419	ALL	RESIDENT	316348.9	3900532	0.001918	9901	DieselExhPM	4.45E-07	1.33YrCancerDerived_Inh	4.45E-07
944	ALL	RESIDENT	316194.1	3900963	0.001879	9901	DieselExhPM	4.36E-07	1.33YrCancerDerived_Inh	4.36E-07
1399	ALL	RESIDENT	316171.8	3901213	0.001863	9901	DieselExhPM	4.32E-07	1.33YrCancerDerived_Inh	4.32E-07
1409	ALL	RESIDENT	316278.6	3900839	0.001862	9901	DieselExhPM	4.32E-07	1.33YrCancerDerived_Inh	4.32E-07
1405	ALL	RESIDENT	316274.4	3900910	0.001791	9901	DieselExhPM	4.16E-07	1.33YrCancerDerived_Inh	4.16E-07
1410	ALL	RESIDENT	316325.2	3900834	0.001773	9901	DieselExhPM	4.12E-07	1.33YrCancerDerived_Inh	4.12E-07
964	ALL	RESIDENT	316194.1	3901063	0.001773	9901	DieselExhPM	4.11E-07	1.33YrCancerDerived_Inh	4.11E-07
1420	ALL	RESIDENT	316457.7	3900524	0.001703	9901	DieselExhPM	3.95E-07	1.33YrCancerDerived_Inh	3.95E-07
945	ALL	RESIDENT	316294.1	3900963	0.001702	9901	DieselExhPM	3.95E-07	1.33YrCancerDerived_Inh	3.95E-07
1402	ALL	RESIDENT	316271.4	3901006	0.001698	9901	DieselExhPM	3.94E-07	1.33YrCancerDerived_Inh	3.94E-07
1416	ALL	RESIDENT	316442.8	3900600	0.001692	9901	DieselExhPM	3.93E-07	1.33YrCancerDerived_Inh	3.93E-07
1406	ALL	RESIDENT	316339	3900898	0.001691	9901	DieselExhPM	3.92E-07	1.33YrCancerDerived_Inh	3.92E-07
1411	ALL	RESIDENT	316376.3	3900832	0.001683	9901	DieselExhPM	3.90E-07	1.33YrCancerDerived_Inh	3.90E-07
985	ALL	RESIDENT	316294.1	3901163	0.00166	9901	DieselExhPM	3.85E-07	1.33YrCancerDerived_Inh	3.85E-07
1403	ALL	RESIDENT	316340.9	3900952	0.00164	9901	DieselExhPM	3.81E-07	1.33YrCancerDerived_Inh	3.81E-07
1412	ALL	RESIDENT	316420.5	3900832	0.001611	9901	DieselExhPM	3.74E-07	1.33YrCancerDerived_Inh	3.74E-07
1400	ALL	RESIDENT	316370.7	3901115	0.001545	9901	DieselExhPM	3.59E-07	1.33YrCancerDerived_Inh	3.59E-07
1413	ALL	RESIDENT	316477.7	3900826	0.001527	9901	DieselExhPM	3.54E-07	1.33YrCancerDerived_Inh	3.54E-07
1421	ALL	SCHOOL	314597.5	3902835	0.000807	9901	DieselExhPM	1.87E-07	1.33YrCancerDerived_Inh	1.87E-07

```
HARP2 - HRACalc (dated 22118) 11/8/2023 9:24:21 AM - Output Log

GLCs loaded successfully
Pollutants loaded successfully
Pathway receptors loaded successfully
**********
RISK SCENARIO SETTINGS

Receptor Type: Resident
Scenario: NCChronic
Calculation Method: Derived

**********
EXPOSURE DURATION PARAMETERS FOR CANCER
**Exposure duration are only adjusted for cancer assessments**

**********
PATHWAYS ENABLED

NOTE: Inhalation is always enabled and used for all assessments.  The remaining pathways are only used for cancer and noncancer chronic
assessments.

Inhalation: True
Soil: False
Dermal: False
Mother's milk: False
Water: False
Fish: False
Homegrown crops: False
Beef: False
Dairy: False
Pig: False
Chicken: False
Egg: False

**********
INHALATION

Daily breathing rate: LongTerm24HR

**Worker Adjustment Factors**
Worker adjustment factors enabled: NO

**Fraction at time at home**
NOTE: Exposure duration (i.e., start age, end age, ED, & FAH) are only adjusted for cancer assessments.

**********
TIER 2 SETTINGS

Tier2 adjustments were used in this assessment.  Please see the input file for details.
Tier2 - What was changed: ED or start age changed
Calculating chronic risk
Chronic risk breakdown by pollutant and receptor saved to: F:\Jobs\41150044HZ\HARP\CONSTHRA\hra\WestsideChronHRANCChronicRisk.csv
Chronic risk total by receptor saved to: F:\Jobs\41150044HZ\HARP\CONSTHRA\hra\WestsideChronHRANCChronicRiskSumByRec.csv
HRA ran successfully
```

Chronic Risk Output

*HARP - HRACalc v22118 11/8/2023 9:24:53 AM - Chronic Risk - Input File: F:\Jobs\41150044HZ\HARP\CONSTHRA\hra\WestsideChronHRAHRAInput.hra

REC	GRP	NETID	X	Y	CONC	POLID	POLABBREV	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/ DEVEL	RESP	SKIN	EYE	BONE/ TEETH	ENDO	BLOOD	ODOR	GENERAL	INH_CONC
570	ALL	SCHOOL	315894.1	3899563	0.003688	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	7.38E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.69E-03
863	ALL	RESIDENT	316094.1	3900563	0.002648	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.30E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.65E-03
944	ALL	RESIDENT	316194.1	3900963	0.001879	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.76E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.88E-03
945	ALL	RESIDENT	316294.1	3900963	0.001702	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.40E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.70E-03
964	ALL	RESIDENT	316194.1	3901063	0.001773	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.55E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.77E-03
985	ALL	RESIDENT	316294.1	3901163	0.00166	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.32E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.66E-03
996	ALL	RESIDENT	314094.1	3901263	0.006029	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.21E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.03E-03
1397	ALL	RESIDENT	314352.3	3900458	0.009029	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.81E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	9.03E-03
1398	ALL	RESIDENT	316092.7	3901224	0.001988	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.98E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.99E-03
1399	ALL	RESIDENT	316171.8	3901213	0.001863	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.73E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.86E-03
1400	ALL	RESIDENT	316370.7	3901115	0.001545	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.09E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.55E-03
1401	ALL	RESIDENT	316081.5	3901009	0.002053	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.11E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.05E-03
1402	ALL	RESIDENT	316271.4	3901006	0.001698	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.40E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.70E-03
1403	ALL	RESIDENT	316340.9	3900952	0.00164	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.28E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.64E-03
1404	ALL	RESIDENT	316177.6	3900899	0.002002	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.00E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.00E-03
1405	ALL	RESIDENT	316274.4	3900910	0.001791	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.58E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.79E-03
1406	ALL	RESIDENT	316339	3900898	0.001691	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.38E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.69E-03
1407	ALL	RESIDENT	316161.7	3900838	0.002128	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.26E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.13E-03
1408	ALL	RESIDENT	316230.7	3900843	0.001961	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.92E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.96E-03
1409	ALL	RESIDENT	316278.6	3900839	0.001862	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.72E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.86E-03
1410	ALL	RESIDENT	316325.2	3900834	0.001773	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.55E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.77E-03
1411	ALL	RESIDENT	316376.3	3900832	0.001683	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.37E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.68E-03
1412	ALL	RESIDENT	316420.5	3900832	0.001611	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.22E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.61E-03
1413	ALL	RESIDENT	316477.7	3900826	0.001527	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.05E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.53E-03
1414	ALL	RESIDENT	316157.7	3900745	0.002253	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.51E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.25E-03
1415	ALL	RESIDENT	316255.4	3900600	0.002105	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.21E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.11E-03
1416	ALL	RESIDENT	316442.8	3900600	0.001692	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.38E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.69E-03
1417	ALL	RESIDENT	316170.3	3900530	0.002407	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.81E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.41E-03
1418	ALL	RESIDENT	316261.9	3900530	0.00214	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.28E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.14E-03
1419	ALL	RESIDENT	316348.9	3900532	0.001918	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.84E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.92E-03
1420	ALL	RESIDENT	316457.7	3900524	0.001703	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.41E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.70E-03
1421	ALL	SCHOOL	314597.5	3902835	0.000807	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.61E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.07E-04
1422	ALL	WORKER	314564.6	3901240	0.020414	9901	DieselExhPM	NonCancerChronicDerived_Inh	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.08E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.04E-02

HARP2 - HRACalc (dated 22118) 4/16/2024 8:39:30 AM - Output Log

GLCs loaded successfully
Pollutants loaded successfully
Pathway receptors loaded successfully
****
RISK SCENARIO SETTINGS

Receptor Type: Worker
Scenario: Cancer
Calculation Method: Derived

****
EXPOSURE DURATION PARAMETERS FOR CANCER

Start Age: 16
Total Exposure Duration: 1.33

Exposure Duration Bin Distribution
3rd Trimester Bin: 0
0<2 Years Bin: 0
2<9 Years Bin: 0
2<16 Years Bin: 0
16<30 Years Bin: 1.33
16 to 70 Years Bin: 0

****
PATHWAYS ENABLED

NOTE: Inhalation is always enabled and used for all assessments. The remaining pathways are only used for cancer and noncancer chronic assessments.

Inhalation: True
Soil: True
Dermal: True
Mother's milk: False
Water: False
Fish: False
Homegrown crops: False
Beef: False
Dairy: False
Pig: False
Chicken: False
Egg: False

****
INHALATION

Daily breathing rate: Moderate8HR

Worker Adjustment Factors
NOTE: The worker adjustment factors below are only used for cancer assessments. However, the GLC adjustment factor is also applied to 8-hr noncancer chronic assessments.
Worker adjustments factors enabled: YES
GLC adjustment factor: 2.8
Exposure frequency: 250

Fraction at time at home
3rd Trimester to 16 years: OFF
16 years to 70 years: OFF

****
SOIL & DERMAL PATHWAY SETTINGS

Deposition rate (m/s): 0.05
Soil mixing depth (m): 0.01
Dermal climate: Mixed

****

TIER 2 SETTINGS

Tier2 adjustments were used in this assessment. Please see the input file for details.
Tier2 - What was changed: ED or start age changed
Calculating cancer risk
Cancer risk breakdown by pollutant and receptor saved to:
F:\Jobs\41150044HZ\HARP\CONSTHRA\hra\ConWorker1.33Cancer_CancerRisk.csv
Cancer risk total by receptor saved to:
F:\Jobs\41150044HZ\HARP\CONSTHRA\hra\ConWorker1.33Cancer_CancerRiskSumByRec.csv
HRA ran successfully

*HARP - HRACalc v22118 4/16/2024 8:39:30 AM - Cancer Risk - Input File: F:\Jobs\41150044HZ\HARP\CONSTHRA\hra\ConWorker1.33Cancer_HRAInput.hra

REC	GRP	NETID	X	Y	CONC	POLID	POLABBREV	RISK_SUM	SCENARIO	DETAILS	INH_RISK
1422	ALL	WORKER	314564.6	3901240	0.020414	9901	DieselExhPM	1.96E-07	1.33YrCancerDe	*	1.96E-07

Westside Industrial Project
Operational Health Risk Assessment -Truck Diesel Particulate Matter Emissions

Source	Daily Round Trips (visits)	Idle Duration per Day (min)	Average Distance per Round Trip (mi)	PM10 Running Exhaust (g/mi)	PM10 Idle Exhaust (g/veh-hr)	DPM Emissions (g/trip)	DPM Emissions (lb/day)	DPM Emissions (lb/year)
On-Site Running Exhaust[1] - Private Road (0-15 mph)	73	0	0.799	0.0094	-	0.008	0.001	0.44
On-Site Running Exhaust[1] - Warehouse Circulation (0-5 mph)	73	0	0.911	0.0114		0.010	0.002	0.61
Off-Site Running Exhaust[2] -Houghton Road East to SR-99 (0-25 mph)	73	0	2.0	0.0081	-	0.016	0.003	0.94
On-Site Idle[3] at Entrance	73	5	-	-	0.01083	0.001	0.0001	0.05
On-Site Idle[3] at Exits	73	5	-	-	0.01083	0.001	0.0001	0.05
On-Site[3] at Truck Parking - East (15 acres), West (6.5 acres) 0-5 mph + Idling	73	5	0.33	0.0114	0.01083	0.005	0.0007	0.27
On-Site Idle at West Docks (40%)	29	5	-	-	0.01083	0.001	0.0001	0.02
On-Site Idle at North Docks (20%)	15	5	-	-	0.01083	0.001	0.0000	0.01
On-Site Idle at East Docks (40%)	29	5	-	-	0.01083	0.001	0.0001	0.02
								2.41

Notes:
All Truck Emission Factors for Buildout Year 2026 for HHDT Diesel Fueled Trucks for Kern County - SJValley Portion using EMFAC Project Level Emission Factors (see Raw Emission Factors Below)

1 On-Site Running Exhast are for average of speeds <10 mph
2 Off-Site Running Exhaust in Project Area (along Houghton Rd) is based on average of speeds <=25 mph
3 Idling accounts for incidences upon entering, egressing in driveways as well as maneuvering at loading docks and in parking stalls.
Assuming 5 minutes per occurance, idling times are assigned 5 each at minutes for driveway idling points and 10 minutes for dock/parking area sources - for a total of 20 minutes per truck visit.
Truck Yard Traffic apportioned by Area (east 69%, west 31%) assume up to 5 minute idle total
Dock Visits apprortioned to 40% West Docks, 40% East Docks and 20% North Docks

EMFAC2021 - Project Level (PL) Web Tool Results (EMFAC2021 v.1.0.2)

calendar_year	season_month	sub_area	vehicle_class	fuel	temperature	midity	process	speed_time	pollutant	emission_rate
2026	Annual	Kern (SJV)	HHDT	Dsl	77	50	RUNEX	5	PM10	0.01140
2026	Annual	Kern (SJV)	HHDT	Dsl	77	50	RUNEX	10	PM10	0.00949
2026	Annual	Kern (SJV)	HHDT	Dsl	77	50	RUNEX	15	PM10	0.00746
2026	Annual	Kern (SJV)	HHDT	Dsl	77	50	RUNEX	20	PM10	0.00637
2026	Annual	Kern (SJV)	HHDT	Dsl	77	50	RUNEX	25	PM10	0.00569
2026	Annual	Kern (SJV)	HHDT	Dsl			IDLEX		PM10	0.01083

Note: Units from EMFAC2021 PM Emission Factors are g/mi for Running Exhaust (RUNEX) and g/veh-hr for Idling Exhaust (IDLEX)

Westside Industrial Project
Modeled Source Parameters - Point Sources

Source Type	Source Group ID	Source Group ID	Stack Ht (m)	Stack Diameter (m)	Exit Temperature (K)	Exit Velocity (m/s)	Source Emission Rate (g/s)	Source Group Emission Rate (g/s)	HARP Group ID	HARP Group Emission Rate (g/s)
Truck Idling - West Docks (9)	IDLE_W, DOCKS	IDLE_W1 to IDLE_W9	3.84	0.10	366	51.71	0.111	1	DOCKS - W	1
Truck Idling - North Docks (6)	IDLE_N, DOCKS	IDLE_N1 to IDLE_N6	3.84	0.10	366	51.71	0.167	1	DOCKS -N	1
Truck Idling - East Docks (9)	IDLE_E, DOCKS	IDLE_E1 to IDLE_E9	3.84	0.10	366	51.71	0.111	1	DOCKS - E	1
Truck Idling - Warehouse Exit	IDLE_EX	IDLE_EX	3.84	0.10	366	51.71	1.00	1	EXIT	1
Truck Idling - Warehouse Entry	IDLE_EN	IDLE_EN	3.84	0.10	366	51.71	1.00	1	ENTER	1

AERMOD Variable Source Multipliers used to apply multiplier of 0.4 to West and 0.4 to East Docks and 0.2 to North Docks. Source Group DOCKS includes idling at East, North and West Docks

Westside Industrial Project
Modeled Source Parameters - Area Sources

Description	Location	Source ID	Source Group ID	Area (m2)	Release Height (m)	Initial Vertical Dimensions (Sigma Z)	Emission Rate (g/s)	AERMOD Area Source Emissions g/m2-s	HARP Group ID	HARP Group Emission Rate (g/s)
Truck Parking - East	Truck Parking East (69%)	TRU_PARKE	TRU_PARK	59,906	3.26	3.04	0.69	1.15E-05	PARK	1
Truck Parking - West	Truck Parking West (31%)	TRU_PARKW		26,816	3.26	3.04	0.31	1.16E-05		

On-site roadway travel treated with same release height and intitial vertical dimensions as line-volume sources

Westside Industrial Project
Modeled Source Parameters - Volume Sources

Source Type	Location	Source ID	Source Group ID	Truck Exhaust Height (m)	Plume Height (m)	Release Height (m)	Source Width (m)	Initial Lateral Dimensions (Sigma Y)	Initial Vertical Dimensions (Sigma Z)	Emission Rate (g/s)	HARP Group ID	HARP Group Emission Rate (g/s)
Off-Site Truck Travel - Houghton East to SR-99	Off-Site Roadways	OFF_RNEX	OFF_RNEX	3.84	6.53	3.26	16.00	7.44	**3.04**	**1**	OFFSITE	**1**
On-Site Truck Travel (2-Lane Road)	On-Site Private Road	ON_RUNEX1	ON_RUNEX	3.84	6.53	3.26	15.00	6.98	**3.04**	**1**	PRIVATE	**1**
On-Site Truck Travel/Warehouse Circulation	On-Site Roadways	ON_RUNEX2	ON_RUNEX	3.84	6.53	3.26	8.60	4.00	**3.04**	**1**	ONSITE	**1**

Notes:
Truck Plume Height = 1.7 x Exhaust Release Height
Truck Width is set at 8.5 feet (2.6m) based on CalTrans legal limits. -->
Release Height for Truck Exhaust = Plume Height/2

	Vehicle Width (m)	Plume/Source Width (m)
On-Site Truck Travel	2.6	8.6

Initial Lateral Dimension Sigma Y = Length (m)/4.3
Initial Vertical Dimension SigmaZ = Height (m)/2.15

PROJECT TITLE:

Westside Industrial Project
Operational HRA -Modeling Set-up

COMMENTS:	SOURCES: **31**	COMPANY NAME:	
	RECEPTORS: **1422**	MODELER:	
		SCALE: 1:21,000 0 0.5 km	
		DATE: **2/5/2024**	PROJECT NO.:

Control Pathway

AERMOD

Dispersion Options

Titles

Westside Industrial - Operational HRA

Dispersion Options

☑ Regulatory Default ☐ Non-Default Options

Dispersion Coefficient

Rural

Output Type

☑ Concentration
☐ Total Deposition (Dry & Wet)
☐ Dry Deposition
☐ Wet Deposition

Plume Depletion

☐ Dry Removal
☐ Wet Removal

Output Warnings

☐ No Output Warnings
☐ Non-fatal Warnings for Non-sequential Met Data

Pollutant / Averaging Time / Terrain Options

Pollutant Type

PM10

Averaging Time Options

Hours ☑ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 6 ☐ 8 ☐ 12 ☐ 24

☐ Month ☑ Period ☐ Annual

Exponential Decay

Option not available

Terrain Height Options

☐ Flat ☑ Elevated

SO: Meters
RE: Meters
TG: Meters

Flagpole Receptors

☐ Yes ☑ No

Default Height = 0.00 m

Control Pathway

Optional Files

Re-Start File	Init File	Multi-Year Analyses	Event Input File	Error Listing File
☐	☐	☐	☐	■

Detailed Error Listing File

Filename: OpsHRA2.err

Source Pathway - Source Inputs

AERMOD

Point Sources

Source Type	Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation (Optional)	Release Height [m]	Emission Rate [g/s]	Gas Exit Temp. [K]	Gas Exit Velocity [m/s]	Stack Inside Diameter [m]
POINT	IDLE_W1	314595.11	3901046.99	101.48	3.84	0.11111	366.00	51.71	0.10
		Warehouse west-side dock idling.							
POINT	IDLE_N1	314622.81	3901109.96	101.54	3.84	0.16700	366.00	51.71	0.10
		Warehouse north-side dock idling.							
POINT	IDLE_E1	314786.00	3901063.76	101.59	3.84	0.11100	366.00	51.71	0.10
		Warehouse east-side dock idling.							
POINT	IDLE_EX	314523.30	3900716.55	101.16	3.84	1.00000	366.00	51.71	0.10
		Truck warehouse exit point idling.							
POINT	IDLE_EN	314799.00	3900705.00	101.37	3.84	1.00000	366.00	51.71	0.10
		Warehouse entry point idling.							
POINT	IDLE_W3	314592.78	3900986.99	101.44	3.84	0.11100	366.00	51.71	0.10
		Warehouse west-side dock idling #3							
POINT	IDLE_W2	314594.00	3901015.88	101.45	3.84	0.11100	366.00	51.71	0.10
		Warehouse west-side dock idling.							
POINT	IDLE_W4	314591.67	3900956.44	101.42	3.84	0.11100	366.00	51.71	0.10
		Warehouse west-side dock idling #4							
POINT	IDLE_W5	314591.67	3900927.00	101.40	3.84	0.11100	366.00	51.71	0.10
		Warehouse west-side dock idling #5							
POINT	IDLE_W6	314591.11	3900898.11	101.37	3.84	0.11100	366.00	51.71	0.10
		Warehouse west-side dock idling #6							
POINT	IDLE_W7	314591.11	3900868.11	101.35	3.84	0.11100	366.00	51.71	0.10
		Warehouse west-side dock idling #7							
POINT	IDLE_W8	314588.33	3900839.22	101.33	3.84	0.11100	366.00	51.71	0.10
		Warehouse west-side dock idling #8							

Source Pathway - Source Inputs

AERMOD

Source Type	Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation (Optional)	Release Height [m]	Emission Rate [g/s]	Gas Exit Temp. [K]	Gas Exit Velocity [m/s]	Stack Inside Diameter [m]
POINT	IDLE_W9	314587.78	3900809.77	101.31	3.84	0.11100	366.00	51.71	0.10
		Warehouse west-side dock idling #9							
POINT	IDLE_E2	314785.44	3901034.87	101.57	3.84	0.11100	366.00	51.71	0.10
		Warehouse east-side dock idling #2.							
POINT	IDLE_E3	314783.78	3901004.32	101.55	3.84	0.11100	366.00	51.71	0.10
		Warehouse east-side dock idling #3.							
POINT	IDLE_E4	314783.78	3900975.43	101.54	3.84	0.11100	366.00	51.71	0.10
		Warehouse east-side dock idling #4.							
POINT	IDLE_E5	314782.11	3900944.87	101.52	3.84	0.11100	366.00	51.71	0.10
		Warehouse east-side dock idling #5.							
POINT	IDLE_E6	314782.11	3900913.21	101.50	3.84	0.11100	366.00	51.71	0.10
		Warehouse east-side dock idling #6.							
POINT	IDLE_E7	314782.11	3900884.87	101.47	3.84	0.11100	366.00	51.71	0.10
		Warehouse east-side dock idling #7.							
POINT	IDLE_E8	314781.56	3900849.87	101.45	3.84	0.11100	366.00	51.71	0.10
		Warehouse east-side dock idling #8.							
POINT	IDLE_E9	314777.73	3900823.66	101.43	3.84	0.11100	366.00	51.71	0.10
		Warehouse east-side dock idling #9.							
POINT	IDLE_N2	314656.08	3901108.65	101.55	3.84	0.16700	366.00	51.71	0.10
		Warehouse north-side dock idling #2.							
POINT	IDLE_N3	314688.04	3901107.35	101.56	3.84	0.16700	366.00	51.71	0.10
		Warehouse north-side dock idling #3.							
POINT	IDLE_N4	314712.16	3901106.69	101.57	3.84	0.16700	366.00	51.71	0.10
		Warehouse north-side dock idling #4.							
POINT	IDLE_N5	314744.12	3901107.35	101.58	3.84	0.16700	366.00	51.71	0.10
		Warehouse north-side dock idling #5.							

Source Pathway - Source Inputs

AERMOD

Source Type	Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation (Optional)	Release Height [m]	Emission Rate [g/s]	Gas Exit Temp. [K]	Gas Exit Velocity [m/s]	Stack Inside Diameter [m]
POINT	IDLE_N6	314767.58	3901107.35	101.59	3.84	0.16700	366.00	51.71	0.10
		Warehouse north-side dock idling #6.							

Polygon Area Sources

Source Type: AREA POLY

Source: TRU_PARKE (East-side truck parking area. (69% Parking Area))

Base Elevation (Optional)	Release Height [m]	Emission Rate [g/ (s-m^2)]	Initial Vertical Dim. [m]	Number of Vertices (or sides)	X Coordinate for Vertices [m]	Y Coordinate for Vertices [m]
101.63	3.26	0.00001	3.04	8	314818.00	3901136.00
		0.00001			314940.79	3901136.22
		0.00001			314932.49	3900619.52
		0.00001			314839.30	3900621.37
		0.00001			314840.22	3900639.82
		0.00001			314826.38	3900640.74
		0.00001			314831.92	3900808.67
		0.00001			314811.62	3900810.51

Source Type: AREA POLY

Source: TRU_PARKW (West Truck Parking Area (31% parking area))

Base Elevation (Optional)	Release Height [m]	Emission Rate [g/ (s-m^2)]	Initial Vertical Dim. [m]	Number of Vertices (or sides)	X Coordinate for Vertices [m]	Y Coordinate for Vertices [m]
101.52	3.26	0.00001	3.04	4	314473.92	3901150.06
		0.00001			314561.58	3901147.29
		0.00001			314550.51	3900836.35
		0.00001			314465.62	3900840.04

Source Pathway - Source Inputs

AERMOD

Line Volume Sources

Source Type: LINE VOLUME

Source: OFF_RNEX (Houghton Road to SR-99)

Length of Side [m]	Emission Rate [g/ s]	Building Height [m]	X Coordinate for Points [m]	Y Coordinate for points [m]	Base Elevation [m]	Release Height [m]
16.00	1.00000		314959.04	3901312.91	101.71	3.26
			315306.11	3901300.25	101.52	3.26
			315526.25	3901288.86	101.30	3.26
			315719.82	3901292.66	101.03	3.26
			316053.82	3901286.97	101.28	3.26
			316217.02	3901275.58	101.29	3.26
			316246.59	3901268.47	101.28	3.26
			316407.72	3901220.27	101.16	3.26
			316418.30	3901221.39	101.16	3.26
			316604.59	3901241.15	101.26	3.26
			316625.04	3901243.32	101.27	3.26

Source Type: LINE VOLUME

Source: ON_RUNEX1 (Private road truck route.)

Length of Side [m]	Emission Rate [g/ s]	Building Height [m]	X Coordinate for Points [m]	Y Coordinate for points [m]	Base Elevation [m]	Release Height [m]
27.00	1.00000		314966.60	3901297.72	101.69	3.26
			314948.90	3900502.91	101.19	3.26
			314457.74	3900521.03	100.86	3.26

Source Pathway - Source Inputs

AERMOD

Source Type: LINE VOLUME

Source: ON_RUNEX2 (One-way truck route by warehouse.)

Length of Side [m]	Emission Rate [g/ s]	Building Height [m]	X Coordinate for Points [m]	Y Coordinate for points [m]	Base Elevation [m]	Release Height [m]
8.60	1.00000		314791.41	3900525.16	101.22	0.00
			314806.33	3900815.99	101.44	0.00
			314808.49	3901125.56	101.61	0.00
			314574.11	3901129.89	101.54	0.00
			314561.34	3900820.80	101.30	0.00
			314530.38	3900821.01	101.28	0.00
			314515.20	3900531.69	100.93	0.00

Source Pathway - Source Inputs

AERMOD

Volume Sources Generated from Line Sources

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
ON_RUNEX2	L0008935	314791.63	3900529.45	101.23	0.00	0.00588	8.60		4.00	3.04
	L0008936	314792.07	3900538.04	101.25	0.00	0.00588	8.60		4.00	3.04
	L0008937	314792.52	3900546.63	101.25	0.00	0.00588	8.60		4.00	3.04
	L0008938	314792.96	3900555.22	101.26	0.00	0.00588	8.60		4.00	3.04
	L0008939	314793.40	3900563.80	101.27	0.00	0.00588	8.60		4.00	3.04
	L0008940	314793.84	3900572.39	101.28	0.00	0.00588	8.60		4.00	3.04
	L0008941	314794.28	3900580.98	101.28	0.00	0.00588	8.60		4.00	3.04
	L0008942	314794.72	3900589.57	101.29	0.00	0.00588	8.60		4.00	3.04
	L0008943	314795.16	3900598.16	101.30	0.00	0.00588	8.60		4.00	3.04
	L0008944	314795.60	3900606.75	101.31	0.00	0.00588	8.60		4.00	3.04
	L0008945	314796.04	3900615.34	101.31	0.00	0.00588	8.60		4.00	3.04
	L0008946	314796.48	3900623.93	101.32	0.00	0.00588	8.60		4.00	3.04
	L0008947	314796.92	3900632.51	101.33	0.00	0.00588	8.60		4.00	3.04
	L0008948	314797.36	3900641.10	101.33	0.00	0.00588	8.60		4.00	3.04
	L0008949	314797.80	3900649.69	101.34	0.00	0.00588	8.60		4.00	3.04
	L0008950	314798.24	3900658.28	101.35	0.00	0.00588	8.60		4.00	3.04
	L0008951	314798.68	3900666.87	101.36	0.00	0.00588	8.60		4.00	3.04
	L0008952	314799.12	3900675.46	101.35	0.00	0.00588	8.60		4.00	3.04
	L0008953	314799.56	3900684.05	101.36	0.00	0.00588	8.60		4.00	3.04
	L0008954	314800.00	3900692.64	101.36	0.00	0.00588	8.60		4.00	3.04
	L0008955	314800.44	3900701.22	101.37	0.00	0.00588	8.60		4.00	3.04
	L0008956	314800.88	3900709.81	101.37	0.00	0.00588	8.60		4.00	3.04
	L0008957	314801.32	3900718.40	101.38	0.00	0.00588	8.60		4.00	3.04
	L0008958	314801.76	3900726.99	101.38	0.00	0.00588	8.60		4.00	3.04

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
ON_RUNEX2	L0008959	314802.20	3900735.58	101.39	0.00	0.00588	8.60		4.00	3.04
	L0008960	314802.64	3900744.17	101.40	0.00	0.00588	8.60		4.00	3.04
	L0008961	314803.08	3900752.76	101.40	0.00	0.00588	8.60		4.00	3.04
	L0008962	314803.53	3900761.35	101.40	0.00	0.00588	8.60		4.00	3.04
	L0008963	314803.97	3900769.93	101.40	0.00	0.00588	8.60		4.00	3.04
	L0008964	314804.41	3900778.52	101.40	0.00	0.00588	8.60		4.00	3.04
	L0008965	314804.85	3900787.11	101.41	0.00	0.00588	8.60		4.00	3.04
	L0008966	314805.29	3900795.70	101.42	0.00	0.00588	8.60		4.00	3.04
	L0008967	314805.73	3900804.29	101.43	0.00	0.00588	8.60		4.00	3.04
	L0008968	314806.17	3900812.88	101.44	0.00	0.00588	8.60		4.00	3.04
	L0008969	314806.37	3900821.47	101.44	0.00	0.00588	8.60		4.00	3.04
	L0008970	314806.43	3900830.07	101.44	0.00	0.00588	8.60		4.00	3.04
	L0008971	314806.49	3900838.67	101.45	0.00	0.00588	8.60		4.00	3.04
	L0008972	314806.55	3900847.27	101.46	0.00	0.00588	8.60		4.00	3.04
	L0008973	314806.61	3900855.87	101.46	0.00	0.00588	8.60		4.00	3.04
	L0008974	314806.67	3900864.47	101.47	0.00	0.00588	8.60		4.00	3.04
	L0008975	314806.73	3900873.07	101.47	0.00	0.00588	8.60		4.00	3.04
	L0008976	314806.79	3900881.67	101.48	0.00	0.00588	8.60		4.00	3.04
	L0008977	314806.85	3900890.27	101.48	0.00	0.00588	8.60		4.00	3.04
	L0008978	314806.91	3900898.87	101.49	0.00	0.00588	8.60		4.00	3.04
	L0008979	314806.97	3900907.47	101.49	0.00	0.00588	8.60		4.00	3.04
	L0008980	314807.03	3900916.07	101.50	0.00	0.00588	8.60		4.00	3.04
	L0008981	314807.09	3900924.67	101.51	0.00	0.00588	8.60		4.00	3.04
	L0008982	314807.15	3900933.27	101.52	0.00	0.00588	8.60		4.00	3.04
	L0008983	314807.21	3900941.87	101.53	0.00	0.00588	8.60		4.00	3.04

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
ON_RUNEX2	L0008984	314807.27	3900950.47	101.53	0.00	0.00588	8.60		4.00	3.04
	L0008985	314807.33	3900959.07	101.53	0.00	0.00588	8.60		4.00	3.04
	L0008986	314807.39	3900967.67	101.53	0.00	0.00588	8.60		4.00	3.04
	L0008987	314807.45	3900976.27	101.54	0.00	0.00588	8.60		4.00	3.04
	L0008988	314807.51	3900984.87	101.55	0.00	0.00588	8.60		4.00	3.04
	L0008989	314807.57	3900993.47	101.56	0.00	0.00588	8.60		4.00	3.04
	L0008990	314807.63	3901002.07	101.56	0.00	0.00588	8.60		4.00	3.04
	L0008991	314807.69	3901010.67	101.56	0.00	0.00588	8.60		4.00	3.04
	L0008992	314807.75	3901019.27	101.57	0.00	0.00588	8.60		4.00	3.04
	L0008993	314807.81	3901027.87	101.57	0.00	0.00588	8.60		4.00	3.04
	L0008994	314807.87	3901036.47	101.58	0.00	0.00588	8.60		4.00	3.04
	L0008995	314807.93	3901045.07	101.59	0.00	0.00588	8.60		4.00	3.04
	L0008996	314807.99	3901053.67	101.59	0.00	0.00588	8.60		4.00	3.04
	L0008997	314808.05	3901062.27	101.59	0.00	0.00588	8.60		4.00	3.04
	L0008998	314808.11	3901070.87	101.59	0.00	0.00588	8.60		4.00	3.04
	L0008999	314808.17	3901079.47	101.60	0.00	0.00588	8.60		4.00	3.04
	L0009000	314808.23	3901088.07	101.60	0.00	0.00588	8.60		4.00	3.04
	L0009001	314808.29	3901096.67	101.61	0.00	0.00588	8.60		4.00	3.04
	L0009002	314808.35	3901105.27	101.61	0.00	0.00588	8.60		4.00	3.04
	L0009003	314808.41	3901113.87	101.61	0.00	0.00588	8.60		4.00	3.04
	L0009004	314808.47	3901122.47	101.62	0.00	0.00588	8.60		4.00	3.04
	L0009005	314802.99	3901125.66	101.62	0.00	0.00588	8.60		4.00	3.04
	L0009006	314794.39	3901125.82	101.62	0.00	0.00588	8.60		4.00	3.04
	L0009007	314785.79	3901125.98	101.61	0.00	0.00588	8.60		4.00	3.04
	L0009008	314777.19	3901126.14	101.61	0.00	0.00588	8.60		4.00	3.04

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
ON_RUNEX2	L0009009	314768.60	3901126.30	101.61	0.00	0.00588	8.60		4.00	3.04
	L0009010	314760.00	3901126.46	101.60	0.00	0.00588	8.60		4.00	3.04
	L0009011	314751.40	3901126.62	101.60	0.00	0.00588	8.60		4.00	3.04
	L0009012	314742.80	3901126.77	101.60	0.00	0.00588	8.60		4.00	3.04
	L0009013	314734.20	3901126.93	101.60	0.00	0.00588	8.60		4.00	3.04
	L0009014	314725.60	3901127.09	101.59	0.00	0.00588	8.60		4.00	3.04
	L0009015	314717.00	3901127.25	101.59	0.00	0.00588	8.60		4.00	3.04
	L0009016	314708.41	3901127.41	101.58	0.00	0.00588	8.60		4.00	3.04
	L0009017	314699.81	3901127.57	101.58	0.00	0.00588	8.60		4.00	3.04
	L0009018	314691.21	3901127.73	101.58	0.00	0.00588	8.60		4.00	3.04
	L0009019	314682.61	3901127.89	101.58	0.00	0.00588	8.60		4.00	3.04
	L0009020	314674.01	3901128.04	101.57	0.00	0.00588	8.60		4.00	3.04
	L0009021	314665.41	3901128.20	101.57	0.00	0.00588	8.60		4.00	3.04
	L0009022	314656.81	3901128.36	101.57	0.00	0.00588	8.60		4.00	3.04
	L0009023	314648.22	3901128.52	101.56	0.00	0.00588	8.60		4.00	3.04
	L0009024	314639.62	3901128.68	101.56	0.00	0.00588	8.60		4.00	3.04
	L0009025	314631.02	3901128.84	101.56	0.00	0.00588	8.60		4.00	3.04
	L0009026	314622.42	3901129.00	101.56	0.00	0.00588	8.60		4.00	3.04
	L0009027	314613.82	3901129.15	101.55	0.00	0.00588	8.60		4.00	3.04
	L0009028	314605.22	3901129.31	101.55	0.00	0.00588	8.60		4.00	3.04
	L0009029	314596.63	3901129.47	101.55	0.00	0.00588	8.60		4.00	3.04
	L0009030	314588.03	3901129.63	101.54	0.00	0.00588	8.60		4.00	3.04
	L0009031	314579.43	3901129.79	101.54	0.00	0.00588	8.60		4.00	3.04
	L0009032	314573.97	3901126.61	101.54	0.00	0.00588	8.60		4.00	3.04
	L0009033	314573.62	3901118.02	101.52	0.00	0.00588	8.60		4.00	3.04

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
ON_RUNEX2	L0009034	314573.26	3901109.42	101.52	0.00	0.00588	8.60		4.00	3.04
	L0009035	314572.91	3901100.83	101.51	0.00	0.00588	8.60		4.00	3.04
	L0009036	314572.55	3901092.24	101.50	0.00	0.00588	8.60		4.00	3.04
	L0009037	314572.20	3901083.65	101.49	0.00	0.00588	8.60		4.00	3.04
	L0009038	314571.84	3901075.05	101.49	0.00	0.00588	8.60		4.00	3.04
	L0009039	314571.49	3901066.46	101.48	0.00	0.00588	8.60		4.00	3.04
	L0009040	314571.14	3901057.87	101.47	0.00	0.00588	8.60		4.00	3.04
	L0009041	314570.78	3901049.27	101.46	0.00	0.00588	8.60		4.00	3.04
	L0009042	314570.43	3901040.68	101.46	0.00	0.00588	8.60		4.00	3.04
	L0009043	314570.07	3901032.09	101.45	0.00	0.00588	8.60		4.00	3.04
	L0009044	314569.72	3901023.50	101.45	0.00	0.00588	8.60		4.00	3.04
	L0009045	314569.36	3901014.90	101.44	0.00	0.00588	8.60		4.00	3.04
	L0009046	314569.01	3901006.31	101.43	0.00	0.00588	8.60		4.00	3.04
	L0009047	314568.65	3900997.72	101.42	0.00	0.00588	8.60		4.00	3.04
	L0009048	314568.30	3900989.13	101.42	0.00	0.00588	8.60		4.00	3.04
	L0009049	314567.94	3900980.53	101.42	0.00	0.00588	8.60		4.00	3.04
	L0009050	314567.59	3900971.94	101.42	0.00	0.00588	8.60		4.00	3.04
	L0009051	314567.23	3900963.35	101.41	0.00	0.00588	8.60		4.00	3.04
	L0009052	314566.88	3900954.76	101.40	0.00	0.00588	8.60		4.00	3.04
	L0009053	314566.52	3900946.16	101.40	0.00	0.00588	8.60		4.00	3.04
	L0009054	314566.17	3900937.57	101.39	0.00	0.00588	8.60		4.00	3.04
	L0009055	314565.81	3900928.98	101.38	0.00	0.00588	8.60		4.00	3.04
	L0009056	314565.46	3900920.38	101.37	0.00	0.00588	8.60		4.00	3.04
	L0009057	314565.10	3900911.79	101.36	0.00	0.00588	8.60		4.00	3.04
	L0009058	314564.75	3900903.20	101.36	0.00	0.00588	8.60		4.00	3.04

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
ON_RUNEX2	L0009059	314564.39	3900894.61	101.35	0.00	0.00588	8.60		4.00	3.04
	L0009060	314564.04	3900886.01	101.35	0.00	0.00588	8.60		4.00	3.04
	L0009061	314563.68	3900877.42	101.34	0.00	0.00588	8.60		4.00	3.04
	L0009062	314563.33	3900868.83	101.33	0.00	0.00588	8.60		4.00	3.04
	L0009063	314562.97	3900860.24	101.33	0.00	0.00588	8.60		4.00	3.04
	L0009064	314562.62	3900851.64	101.32	0.00	0.00588	8.60		4.00	3.04
	L0009065	314562.26	3900843.05	101.31	0.00	0.00588	8.60		4.00	3.04
	L0009066	314561.91	3900834.46	101.31	0.00	0.00588	8.60		4.00	3.04
	L0009067	314561.55	3900825.87	101.30	0.00	0.00588	8.60		4.00	3.04
	L0009068	314557.81	3900820.82	101.29	0.00	0.00588	8.60		4.00	3.04
	L0009069	314549.21	3900820.88	101.29	0.00	0.00588	8.60		4.00	3.04
	L0009070	314540.61	3900820.94	101.28	0.00	0.00588	8.60		4.00	3.04
	L0009071	314532.01	3900821.00	101.28	0.00	0.00588	8.60		4.00	3.04
	L0009072	314530.02	3900814.05	101.27	0.00	0.00588	8.60		4.00	3.04
	L0009073	314529.57	3900805.47	101.26	0.00	0.00588	8.60		4.00	3.04
	L0009074	314529.12	3900796.88	101.25	0.00	0.00588	8.60		4.00	3.04
	L0009075	314528.66	3900788.29	101.24	0.00	0.00588	8.60		4.00	3.04
	L0009076	314528.21	3900779.70	101.23	0.00	0.00588	8.60		4.00	3.04
	L0009077	314527.76	3900771.11	101.22	0.00	0.00588	8.60		4.00	3.04
	L0009078	314527.31	3900762.52	101.22	0.00	0.00588	8.60		4.00	3.04
	L0009079	314526.86	3900753.94	101.21	0.00	0.00588	8.60		4.00	3.04
	L0009080	314526.41	3900745.35	101.20	0.00	0.00588	8.60		4.00	3.04
	L0009081	314525.96	3900736.76	101.19	0.00	0.00588	8.60		4.00	3.04
	L0009082	314525.51	3900728.17	101.18	0.00	0.00588	8.60		4.00	3.04
	L0009083	314525.06	3900719.58	101.17	0.00	0.00588	8.60		4.00	3.04

Source Pathway - Source Inputs

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Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
ON_RUNEX2	L0009084	314524.61	3900711.00	101.16	0.00	0.00588	8.60		4.00	3.04
	L0009085	314524.16	3900702.41	101.15	0.00	0.00588	8.60		4.00	3.04
	L0009086	314523.71	3900693.82	101.14	0.00	0.00588	8.60		4.00	3.04
	L0009087	314523.26	3900685.23	101.13	0.00	0.00588	8.60		4.00	3.04
	L0009088	314522.81	3900676.64	101.12	0.00	0.00588	8.60		4.00	3.04
	L0009089	314522.36	3900668.05	101.11	0.00	0.00588	8.60		4.00	3.04
	L0009090	314521.90	3900659.47	101.10	0.00	0.00588	8.60		4.00	3.04
	L0009091	314521.45	3900650.88	101.09	0.00	0.00588	8.60		4.00	3.04
	L0009092	314521.00	3900642.29	101.08	0.00	0.00588	8.60		4.00	3.04
	L0009093	314520.55	3900633.70	101.07	0.00	0.00588	8.60		4.00	3.04
	L0009094	314520.10	3900625.11	101.06	0.00	0.00588	8.60		4.00	3.04
	L0009095	314519.65	3900616.53	101.05	0.00	0.00588	8.60		4.00	3.04
	L0009096	314519.20	3900607.94	101.04	0.00	0.00588	8.60		4.00	3.04
	L0009097	314518.75	3900599.35	101.03	0.00	0.00588	8.60		4.00	3.04
	L0009098	314518.30	3900590.76	101.02	0.00	0.00588	8.60		4.00	3.04
	L0009099	314517.85	3900582.17	101.00	0.00	0.00588	8.60		4.00	3.04
	L0009100	314517.40	3900573.58	101.00	0.00	0.00588	8.60		4.00	3.04
	L0009101	314516.95	3900565.00	100.99	0.00	0.00588	8.60		4.00	3.04
	L0009102	314516.50	3900556.41	100.98	0.00	0.00588	8.60		4.00	3.04
	L0009103	314516.05	3900547.82	100.96	0.00	0.00588	8.60		4.00	3.04
	L0009104	314515.60	3900539.23	100.95	0.00	0.00588	8.60		4.00	3.04

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
OFF_RNEX	L0009248	314967.03	3901312.61	101.70	3.26	0.00952	16.00		7.44	3.04
	L0009249	314983.02	3901312.03	101.70	3.26	0.00952	16.00		7.44	3.04

Source Pathway - Source Inputs

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Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
OFF_RNEX	L0009250	314999.01	3901311.45	101.70	3.26	0.00952	16.00		7.44	3.04
	L0009251	315015.00	3901310.87	101.69	3.26	0.00952	16.00		7.44	3.04
	L0009252	315030.99	3901310.28	101.68	3.26	0.00952	16.00		7.44	3.04
	L0009253	315046.98	3901309.70	101.68	3.26	0.00952	16.00		7.44	3.04
	L0009254	315062.97	3901309.12	101.68	3.26	0.00952	16.00		7.44	3.04
	L0009255	315078.96	3901308.53	101.67	3.26	0.00952	16.00		7.44	3.04
	L0009256	315094.95	3901307.95	101.66	3.26	0.00952	16.00		7.44	3.04
	L0009257	315110.94	3901307.37	101.66	3.26	0.00952	16.00		7.44	3.04
	L0009258	315126.93	3901306.78	101.64	3.26	0.00952	16.00		7.44	3.04
	L0009259	315142.91	3901306.20	101.64	3.26	0.00952	16.00		7.44	3.04
	L0009260	315158.90	3901305.62	101.63	3.26	0.00952	16.00		7.44	3.04
	L0009261	315174.89	3901305.04	101.62	3.26	0.00952	16.00		7.44	3.04
	L0009262	315190.88	3901304.45	101.61	3.26	0.00952	16.00		7.44	3.04
	L0009263	315206.87	3901303.87	101.60	3.26	0.00952	16.00		7.44	3.04
	L0009264	315222.86	3901303.29	101.59	3.26	0.00952	16.00		7.44	3.04
	L0009265	315238.85	3901302.70	101.58	3.26	0.00952	16.00		7.44	3.04
	L0009266	315254.84	3901302.12	101.57	3.26	0.00952	16.00		7.44	3.04
	L0009267	315270.83	3901301.54	101.55	3.26	0.00952	16.00		7.44	3.04
	L0009268	315286.82	3901300.95	101.54	3.26	0.00952	16.00		7.44	3.04
	L0009269	315302.81	3901300.37	101.52	3.26	0.00952	16.00		7.44	3.04
	L0009270	315318.79	3901299.60	101.51	3.26	0.00952	16.00		7.44	3.04
	L0009271	315334.77	3901298.77	101.50	3.26	0.00952	16.00		7.44	3.04
	L0009272	315350.75	3901297.94	101.48	3.26	0.00952	16.00		7.44	3.04
	L0009273	315366.73	3901297.12	101.47	3.26	0.00952	16.00		7.44	3.04
	L0009274	315382.70	3901296.29	101.45	3.26	0.00952	16.00		7.44	3.04

Source Pathway - Source Inputs

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Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
OFF_RNEX	L0009275	315398.68	3901295.46	101.44	3.26	0.00952	16.00		7.44	3.04
	L0009276	315414.66	3901294.64	101.42	3.26	0.00952	16.00		7.44	3.04
	L0009277	315430.64	3901293.81	101.41	3.26	0.00952	16.00		7.44	3.04
	L0009278	315446.62	3901292.98	101.39	3.26	0.00952	16.00		7.44	3.04
	L0009279	315462.60	3901292.16	101.38	3.26	0.00952	16.00		7.44	3.04
	L0009280	315478.58	3901291.33	101.36	3.26	0.00952	16.00		7.44	3.04
	L0009281	315494.55	3901290.50	101.34	3.26	0.00952	16.00		7.44	3.04
	L0009282	315510.53	3901289.68	101.32	3.26	0.00952	16.00		7.44	3.04
	L0009283	315526.51	3901288.87	101.30	3.26	0.00952	16.00		7.44	3.04
	L0009284	315542.51	3901289.18	101.27	3.26	0.00952	16.00		7.44	3.04
	L0009285	315558.51	3901289.50	101.22	3.26	0.00952	16.00		7.44	3.04
	L0009286	315574.50	3901289.81	101.18	3.26	0.00952	16.00		7.44	3.04
	L0009287	315590.50	3901290.12	101.17	3.26	0.00952	16.00		7.44	3.04
	L0009288	315606.50	3901290.44	101.14	3.26	0.00952	16.00		7.44	3.04
	L0009289	315622.49	3901290.75	101.12	3.26	0.00952	16.00		7.44	3.04
	L0009290	315638.49	3901291.07	101.09	3.26	0.00952	16.00		7.44	3.04
	L0009291	315654.49	3901291.38	101.07	3.26	0.00952	16.00		7.44	3.04
	L0009292	315670.48	3901291.69	101.05	3.26	0.00952	16.00		7.44	3.04
	L0009293	315686.48	3901292.01	101.04	3.26	0.00952	16.00		7.44	3.04
	L0009294	315702.48	3901292.32	101.03	3.26	0.00952	16.00		7.44	3.04
	L0009295	315718.48	3901292.63	101.03	3.26	0.00952	16.00		7.44	3.04
	L0009296	315734.47	3901292.41	101.02	3.26	0.00952	16.00		7.44	3.04
	L0009297	315750.47	3901292.14	101.02	3.26	0.00952	16.00		7.44	3.04
	L0009298	315766.47	3901291.87	101.02	3.26	0.00952	16.00		7.44	3.04
	L0009299	315782.47	3901291.59	101.02	3.26	0.00952	16.00		7.44	3.04

Source Pathway - Source Inputs

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Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
OFF_RNEX	L0009300	315798.46	3901291.32	101.03	3.26	0.00952	16.00		7.44	3.04
	L0009301	315814.46	3901291.05	101.04	3.26	0.00952	16.00		7.44	3.04
	L0009302	315830.46	3901290.77	101.06	3.26	0.00952	16.00		7.44	3.04
	L0009303	315846.46	3901290.50	101.08	3.26	0.00952	16.00		7.44	3.04
	L0009304	315862.45	3901290.23	101.10	3.26	0.00952	16.00		7.44	3.04
	L0009305	315878.45	3901289.96	101.14	3.26	0.00952	16.00		7.44	3.04
	L0009306	315894.45	3901289.68	101.16	3.26	0.00952	16.00		7.44	3.04
	L0009307	315910.45	3901289.41	101.18	3.26	0.00952	16.00		7.44	3.04
	L0009308	315926.44	3901289.14	101.20	3.26	0.00952	16.00		7.44	3.04
	L0009309	315942.44	3901288.87	101.22	3.26	0.00952	16.00		7.44	3.04
	L0009310	315958.44	3901288.59	101.23	3.26	0.00952	16.00		7.44	3.04
	L0009311	315974.44	3901288.32	101.23	3.26	0.00952	16.00		7.44	3.04
	L0009312	315990.44	3901288.05	101.25	3.26	0.00952	16.00		7.44	3.04
	L0009313	316006.43	3901287.77	101.27	3.26	0.00952	16.00		7.44	3.04
	L0009314	316022.43	3901287.50	101.28	3.26	0.00952	16.00		7.44	3.04
	L0009315	316038.43	3901287.23	101.28	3.26	0.00952	16.00		7.44	3.04
	L0009316	316054.42	3901286.92	101.28	3.26	0.00952	16.00		7.44	3.04
	L0009317	316070.39	3901285.81	101.29	3.26	0.00952	16.00		7.44	3.04
	L0009318	316086.35	3901284.70	101.30	3.26	0.00952	16.00		7.44	3.04
	L0009319	316102.31	3901283.58	101.30	3.26	0.00952	16.00		7.44	3.04
	L0009320	316118.27	3901282.47	101.30	3.26	0.00952	16.00		7.44	3.04
	L0009321	316134.23	3901281.36	101.30	3.26	0.00952	16.00		7.44	3.04
	L0009322	316150.19	3901280.24	101.30	3.26	0.00952	16.00		7.44	3.04
	L0009323	316166.15	3901279.13	101.30	3.26	0.00952	16.00		7.44	3.04
	L0009324	316182.11	3901278.02	101.29	3.26	0.00952	16.00		7.44	3.04

Source Pathway - Source Inputs

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Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
OFF_RNEX	L0009325	316198.08	3901276.90	101.29	3.26	0.00952	16.00		7.44	3.04
	L0009326	316214.04	3901275.79	101.29	3.26	0.00952	16.00		7.44	3.04
	L0009327	316229.67	3901272.54	101.29	3.26	0.00952	16.00		7.44	3.04
	L0009328	316245.23	3901268.80	101.28	3.26	0.00952	16.00		7.44	3.04
	L0009329	316260.57	3901264.29	101.28	3.26	0.00952	16.00		7.44	3.04
	L0009330	316275.90	3901259.70	101.27	3.26	0.00952	16.00		7.44	3.04
	L0009331	316291.23	3901255.12	101.27	3.26	0.00952	16.00		7.44	3.04
	L0009332	316306.56	3901250.53	101.26	3.26	0.00952	16.00		7.44	3.04
	L0009333	316321.89	3901245.94	101.25	3.26	0.00952	16.00		7.44	3.04
	L0009334	316337.22	3901241.36	101.24	3.26	0.00952	16.00		7.44	3.04
	L0009335	316352.55	3901236.77	101.23	3.26	0.00952	16.00		7.44	3.04
	L0009336	316367.88	3901232.19	101.20	3.26	0.00952	16.00		7.44	3.04
	L0009337	316383.20	3901227.60	101.19	3.26	0.00952	16.00		7.44	3.04
	L0009338	316398.53	3901223.02	101.17	3.26	0.00952	16.00		7.44	3.04
	L0009339	316414.10	3901220.95	101.16	3.26	0.00952	16.00		7.44	3.04
	L0009340	316430.01	3901222.63	101.17	3.26	0.00952	16.00		7.44	3.04
	L0009341	316445.92	3901224.32	101.18	3.26	0.00952	16.00		7.44	3.04
	L0009342	316461.83	3901226.01	101.19	3.26	0.00952	16.00		7.44	3.04
	L0009343	316477.74	3901227.70	101.21	3.26	0.00952	16.00		7.44	3.04
	L0009344	316493.65	3901229.38	101.22	3.26	0.00952	16.00		7.44	3.04
	L0009345	316509.56	3901231.07	101.23	3.26	0.00952	16.00		7.44	3.04
	L0009346	316525.47	3901232.76	101.23	3.26	0.00952	16.00		7.44	3.04
	L0009347	316541.38	3901234.45	101.23	3.26	0.00952	16.00		7.44	3.04
	L0009348	316557.29	3901236.13	101.24	3.26	0.00952	16.00		7.44	3.04
	L0009349	316573.20	3901237.82	101.25	3.26	0.00952	16.00		7.44	3.04

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
OFF_RNEX	L0009350	316589.11	3901239.51	101.26	3.26	0.00952	16.00		7.44	3.04
	L0009351	316605.02	3901241.20	101.26	3.26	0.00952	16.00		7.44	3.04
	L0009352	316620.94	3901242.88	101.26	3.26	0.00952	16.00		7.44	3.04

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
ON_RUNEX1	L0009667	314966.30	3901284.22	101.69	3.26	0.02083	27.00		12.56	3.04
	L0009668	314965.70	3901257.23	101.68	3.26	0.02083	27.00		12.56	3.04
	L0009669	314965.10	3901230.23	101.67	3.26	0.02083	27.00		12.56	3.04
	L0009670	314964.50	3901203.24	101.67	3.26	0.02083	27.00		12.56	3.04
	L0009671	314963.90	3901176.25	101.65	3.26	0.02083	27.00		12.56	3.04
	L0009672	314963.30	3901149.26	101.65	3.26	0.02083	27.00		12.56	3.04
	L0009673	314962.70	3901122.26	101.63	3.26	0.02083	27.00		12.56	3.04
	L0009674	314962.10	3901095.27	101.62	3.26	0.02083	27.00		12.56	3.04
	L0009675	314961.49	3901068.28	101.60	3.26	0.02083	27.00		12.56	3.04
	L0009676	314960.89	3901041.28	101.59	3.26	0.02083	27.00		12.56	3.04
	L0009677	314960.29	3901014.29	101.57	3.26	0.02083	27.00		12.56	3.04
	L0009678	314959.69	3900987.30	101.55	3.26	0.02083	27.00		12.56	3.04
	L0009679	314959.09	3900960.30	101.53	3.26	0.02083	27.00		12.56	3.04
	L0009680	314958.49	3900933.31	101.52	3.26	0.02083	27.00		12.56	3.04
	L0009681	314957.89	3900906.32	101.50	3.26	0.02083	27.00		12.56	3.04
	L0009682	314957.29	3900879.32	101.48	3.26	0.02083	27.00		12.56	3.04
	L0009683	314956.68	3900852.33	101.47	3.26	0.02083	27.00		12.56	3.04
	L0009684	314956.08	3900825.34	101.45	3.26	0.02083	27.00		12.56	3.04
	L0009685	314955.48	3900798.34	101.43	3.26	0.02083	27.00		12.56	3.04
	L0009686	314954.88	3900771.35	101.41	3.26	0.02083	27.00		12.56	3.04

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
ON_RUNEX1	L0009687	314954.28	3900744.36	101.39	3.26	0.02083	27.00		12.56	3.04
	L0009688	314953.68	3900717.36	101.37	3.26	0.02083	27.00		12.56	3.04
	L0009689	314953.08	3900690.37	101.36	3.26	0.02083	27.00		12.56	3.04
	L0009690	314952.48	3900663.38	101.35	3.26	0.02083	27.00		12.56	3.04
	L0009691	314951.88	3900636.38	101.33	3.26	0.02083	27.00		12.56	3.04
	L0009692	314951.27	3900609.39	101.31	3.26	0.02083	27.00		12.56	3.04
	L0009693	314950.67	3900582.40	101.29	3.26	0.02083	27.00		12.56	3.04
	L0009694	314950.07	3900555.40	101.27	3.26	0.02083	27.00		12.56	3.04
	L0009695	314949.47	3900528.41	101.24	3.26	0.02083	27.00		12.56	3.04
	L0009696	314947.41	3900502.96	101.20	3.26	0.02083	27.00		12.56	3.04
	L0009697	314920.43	3900503.96	101.22	3.26	0.02083	27.00		12.56	3.04
	L0009698	314893.45	3900504.96	101.23	3.26	0.02083	27.00		12.56	3.04
	L0009699	314866.46	3900505.95	101.23	3.26	0.02083	27.00		12.56	3.04
	L0009700	314839.48	3900506.95	101.22	3.26	0.02083	27.00		12.56	3.04
	L0009701	314812.50	3900507.94	101.21	3.26	0.02083	27.00		12.56	3.04
	L0009702	314785.52	3900508.94	101.20	3.26	0.02083	27.00		12.56	3.04
	L0009703	314758.54	3900509.93	101.17	3.26	0.02083	27.00		12.56	3.04
	L0009704	314731.56	3900510.93	101.15	3.26	0.02083	27.00		12.56	3.04
	L0009705	314704.57	3900511.92	101.12	3.26	0.02083	27.00		12.56	3.04
	L0009706	314677.59	3900512.92	101.10	3.26	0.02083	27.00		12.56	3.04
	L0009707	314650.61	3900513.92	101.07	3.26	0.02083	27.00		12.56	3.04
	L0009708	314623.63	3900514.91	101.03	3.26	0.02083	27.00		12.56	3.04
	L0009709	314596.65	3900515.91	101.01	3.26	0.02083	27.00		12.56	3.04
	L0009710	314569.67	3900516.90	100.98	3.26	0.02083	27.00		12.56	3.04
	L0009711	314542.68	3900517.90	100.95	3.26	0.02083	27.00		12.56	3.04

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
ON_RUNEX1	L0009712	314515.70	3900518.89	100.92	3.26	0.02083	27.00		12.56	3.04
	L0009713	314488.72	3900519.89	100.89	3.26	0.02083	27.00		12.56	3.04
	L0009714	314461.74	3900520.88	100.86	3.26	0.02083	27.00		12.56	3.04

Source Pathway

Building Downwash Information

Option not in use

Emission Rate Units for Output

For Concentration

Unit Factor:	1E6
Emission Unit Label:	GRAMS/SEC
Concentration Unit Label:	MICROGRAMS/M**3

Source Groups

Source Group ID:	List of Sources in Group (Source Range or Single Sources)
TRU_PARK	TRU_PARKE
	TRU_PARKW
PRIV_RUN	ON_RUNEX1
ON_RUNEX	ON_RUNEX2
OFF_RNEX	OFF_RNEX
IDLE_W	IDLE_W1
	IDLE_W3
	IDLE_W2
	IDLE_W4
	IDLE_W5
	IDLE_W6
	IDLE_W7
	IDLE_W8
	IDLE_W9
IDLE_N	IDLE_N1
	IDLE_N2
	IDLE_N3
	IDLE_N4
	IDLE_N5
	IDLE_N6
IDLE_EX	IDLE_EX
IDLE_EN	IDLE_EN
IDLE_E	IDLE_E1
	IDLE_E2
	IDLE_E3
	IDLE_E4
	IDLE_E5
	IDLE_E6

	IDLE_E7
	IDLE_E8
	IDLE_E9

Source Group ID: **ALL**	List of Sources in Group (Source Range or Single Sources)
	All Sources Included

Meteorology Pathway

AERMOD

Met Input Data

Surface Met Data

Filename: ..\..\41150044\Bakersfield_18-22.SFC
Format Type: Default AERMET format

Profile Met Data

Filename: ..\..\41150044\Bakersfield_18-22.PFL
Format Type: Default AERMET format

Wind Speed

☐ Wind Speeds are Vector Mean (Not Scalar Means)

Wind Direction

Rotation Adjustment [deg]:

Potential Temperature Profile

Base Elevation above MSL (for Primary Met Tower): 150.00 [m]

Meteorological Station Data

Stations	Station No.	Year	X Coordinate [m]	Y Coordinate [m]	Station Name
Surface		2018			KBFL
Upper Air		2018			OAKLAND/WSO AP

Data Period

Data Period to Process

Start Date: 1/1/2018 Start Hour: 1 End Date: 12/31/2022 End Hour: 24

Wind Speed Categories

Stability Category	Wind Speed [m/s]	Stability Category	Wind Speed [m/s]
A	1.54	D	8.23
B	3.09	E	10.8
C	5.14	F	No Upper Bound

Output Pathway

Tabular Printed Outputs

Short Term Averaging Period	RECTABLE Highest Values Table										MAXTABLE Maximum Values Table	DAYTABLE Daily Values Table
	1st	2nd	3rd	4th	5th	6th	7th	8th	9th	10th		
1	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐		No

Contour Plot Files (PLOTFILE)

Path for PLOTFILES: OPSHRA2.AD

Averaging Period	Source Group ID	High Value	File Name
Period	IDLE_EN		IDLE_EN_PE.PLT
Period	IDLE_EX		IDLE_EX_PE.PLT
1	IDLE_EX	1st	IDLE_EX_01.PLT
1	IDLE_EN	1st	IDLE_EN_01.PLT
1	TRU_PARK	1st	TRU_PARK_01.PLT
Period	TRU_PARK		TRU_PARK_PE.PLT
Period	OFF_RNEX		OFFSITE_PE.PLT
1	OFF_RNEX	1st	OFFSITE_01.PLT
1	PRIV_RUN	1st	PRIVATE_01.PLT
Period	PRIV_RUN		PRIVATE_PE.PLT
Period	ON_RUNEX		ONSITE_RUN_PE.PLT
1	ON_RUNEX	1st	ONSITE_RUN_01.PLT
Period	IDLE_N		DOCKS_N_PE.PLT
Period	IDLE_W		DOCKS_W_PE.PLT
Period	IDLE_E		DOCKS_E_PE.PLT
1	IDLE_E	1st	DOCKS_E_01.PLT
1	IDLE_N	1st	DOCKS_N_01.PLT
1	IDLE_W	1st	DOCKS_W_01.PLT

HARP Project Summary Report 4/16/2024 10:53:59 AM

PROJECT INFORMATION
HARP Version: 22118
Project Name: OpsHRA2
Project Output Directory: F:\Jobs\41150044HZ\HARP\OpsHRA2
HARP Database: NA

FACILITY INFORMATION
Origin
X (m):0
Y (m):0
Zone:1
No. of Sources:0
No. of Buildings:0

EMISSION INVENTORY
No. of Pollutants:9
No. of Background Pollutants:0

Emissions

ScrID	StkID	ProID	PolID	PolAbbrev	Multi	Annual Ems (lbs/yr)	MaxHr Ems (lbs/hr)	MWAF
ENTER	0	0	9901	DieselExhPM	1	0.05	0	1
EXIT	0	0	9901	DieselExhPM	1	0.05	0	1
PARKING	0	0	9901	DieselExhPM	1	0.27	0	1
ONSITE	0	0	9901	DieselExhPM	1	0.61	0	1
PRIV_ROAD	0	0	9901	DieselExhPM	1	0.44	0	1
OFFSITE	0	0	9901	DieselExhPM	1	0.94	0	1
DOCKS_W	0	0	9901	DieselExhPM	1	0.02	0	1
DOCKS_E	0	0	9901	DieselExhPM	1	0.02	0	1
DOCKS_N	0	0	9901	DieselExhPM	1	0.01	0	1

Background

PolID	PolAbbrev	Conc (ug/m^3)	MWAF

Ground level concentration files (\glc\)

9901MAXHR.txt
9901PER.txt

POLLUTANT HEALTH INFORMATION
Health Database: C:\HARP2\Tables\HEALTH17320.mdb
Health Table Version: HEALTH23279
Official: True

PolID	PolAbbrev	InhCancer	OralCancer	AcuteREL	InhChronicREL	OralChronicREL	InhChronic8HRREL
9901	DieselExhPM	1.1			5		

HARP2 - HRACalc (dated 22118) 4/16/2024 6:31:53 AM - Output Log

GLCs loaded successfully
Pollutants loaded successfully
Pathway receptors loaded successfully
****
RISK SCENARIO SETTINGS

Receptor Type: Resident
Scenario: Cancer
Calculation Method: Derived

****
EXPOSURE DURATION PARAMETERS FOR CANCER

Start Age: -0.25
Total Exposure Duration: 70

Exposure Duration Bin Distribution
3rd Trimester Bin: 0.25
0<2 Years Bin: 2
2<9 Years Bin: 0
2<16 Years Bin: 14
16<30 Years Bin: 0
16 to 70 Years Bin: 54

****
PATHWAYS ENABLED

NOTE: Inhalation is always enabled and used for all assessments. The remaining pathways are only used for cancer and noncancer chronic assessments.

Inhalation: True
Soil: False
Dermal: False
Mother's milk: False
Water: False
Fish: False
Homegrown crops: False
Beef: False
Dairy: False
Pig: False
Chicken: False
Egg: False

****
INHALATION

Daily breathing rate: LongTerm24HR

Worker Adjustment Factors
Worker adjustment factors enabled: NO

Fraction at time at home
3rd Trimester to 16 years: OFF
16 years to 70 years: OFF

****
TIER 2 SETTINGS
Tier2 not used.

****

Calculating cancer risk
Cancer risk breakdown by pollutant and receptor saved to: F:\Jobs\41150044HZ\HARP\OpsHRA2\hra\WestsideOpsRes70YrCancerRisk.csv
Cancer risk total by receptor saved to: F:\Jobs\41150044HZ\HARP\OpsHRA2\hra\WestsideOpsRes70YrCancerRiskSumByRec.csv
HRA ran successfully

*HARP - HRACalc v22118 4/16/2024 7:34:14 AM - Cancer Risk - Input File: F:\Jobs\41150044HZ\HARP\OpsHRA2\hra\WestsideResRisk70HRAInput.hra

REC	GRP	NETID	X	Y	CONC	POLID	POLABBREV	RISK_SUM	SCENARIO	DETAILS	INH_RISK	2ND_DRIVER
1003	**ALL**	**NESTED-PMI**	**316094.1**	**3901263**	**0.000797**	**9901**	**DieselExhPM**	**8.36E-07**	**70YrCancerDer**	*	**8.36E-07**	
1398	**ALL**	**RESIDENT**	**316092.7**	**3901224**	**0.000471**	**9901**	**DieselExhPM**	**4.95E-07**	**70YrCancerDer**	*	**4.95E-07**	
1399	ALL	RESIDENT	316171.8	3901213	0.000452	9901	DieselExhPM	4.74E-07	70YrCancerDeri	*	4.74E-07	
985	ALL	RESIDENT	316294.1	3901163	0.000332	9901	DieselExhPM	3.48E-07	70YrCancerDeri	*	3.48E-07	
1400	ALL	RESIDENT	316370.7	3901115	0.000238	9901	DieselExhPM	2.50E-07	70YrCancerDeri	*	2.50E-07	
964	ALL	RESIDENT	316194.1	3901063	0.00017	9901	DieselExhPM	1.79E-07	70YrCancerDeri	*	1.79E-07	
1401	ALL	RESIDENT	316081.5	3901009	0.000141	9901	DieselExhPM	1.48E-07	70YrCancerDeri	*	1.48E-07	
996	ALL	RESIDENT	314094.1	3901263	0.000135	9901	DieselExhPM	1.42E-07	70YrCancerDeri	*	1.42E-07	
1402	ALL	RESIDENT	316271.4	3901006	0.000135	9901	DieselExhPM	1.41E-07	70YrCancerDeri	*	1.41E-07	
944	ALL	RESIDENT	316194.1	3900963	0.000118	9901	DieselExhPM	1.24E-07	70YrCancerDeri	*	1.24E-07	
945	ALL	RESIDENT	316294.1	3900963	0.000116	9901	DieselExhPM	1.22E-07	70YrCancerDeri	*	1.22E-07	
1397	ALL	RESIDENT	314352.3	3900458	0.000115	9901	DieselExhPM	1.21E-07	70YrCancerDeri	*	1.21E-07	
1403	ALL	RESIDENT	316340.9	3900952	0.000112	9901	DieselExhPM	1.18E-07	70YrCancerDeri	*	1.18E-07	
1405	ALL	RESIDENT	316274.4	3900910	0.000101	9901	DieselExhPM	1.06E-07	70YrCancerDeri	*	1.06E-07	
1404	ALL	RESIDENT	316177.6	3900899	0.0001	9901	DieselExhPM	1.05E-07	70YrCancerDeri	*	1.05E-07	
1406	ALL	RESIDENT	316339	3900898	9.63E-05	9901	DieselExhPM	1.01E-07	70YrCancerDeri	*	1.01E-07	
1407	ALL	RESIDENT	316161.7	3900838	8.80E-05	9901	DieselExhPM	9.24E-08	70YrCancerDeri	*	9.24E-08	
1408	ALL	RESIDENT	316230.7	3900843	8.78E-05	9901	DieselExhPM	9.22E-08	70YrCancerDeri	*	9.22E-08	
1409	ALL	RESIDENT	316278.6	3900839	8.58E-05	9901	DieselExhPM	9.00E-08	70YrCancerDeri	*	9.00E-08	
1410	ALL	RESIDENT	316325.2	3900834	8.32E-05	9901	DieselExhPM	8.73E-08	70YrCancerDeri	*	8.73E-08	
1411	ALL	RESIDENT	316376.3	3900832	8.12E-05	9901	DieselExhPM	8.53E-08	70YrCancerDeri	*	8.53E-08	
1412	ALL	RESIDENT	316420.5	3900832	7.97E-05	9901	DieselExhPM	8.37E-08	70YrCancerDeri	*	8.37E-08	
1413	ALL	RESIDENT	316477.7	3900826	7.64E-05	9901	DieselExhPM	8.01E-08	70YrCancerDeri	*	8.01E-08	
1414	ALL	RESIDENT	316157.7	3900745	7.40E-05	9901	DieselExhPM	7.77E-08	70YrCancerDeri	*	7.77E-08	
863	ALL	RESIDENT	316094.1	3900563	5.76E-05	9901	DieselExhPM	6.05E-08	70YrCancerDeri	*	6.05E-08	
1415	ALL	RESIDENT	316255.4	3900600	5.76E-05	9901	DieselExhPM	6.05E-08	70YrCancerDeri	*	6.05E-08	
1417	ALL	RESIDENT	316170.3	3900530	5.39E-05	9901	DieselExhPM	5.66E-08	70YrCancerDeri	*	5.66E-08	
1416	ALL	RESIDENT	316442.8	3900600	5.29E-05	9901	DieselExhPM	5.56E-08	70YrCancerDeri	*	5.56E-08	
1418	ALL	RESIDENT	316261.9	3900530	5.25E-05	9901	DieselExhPM	5.51E-08	70YrCancerDeri	*	5.51E-08	
1419	ALL	RESIDENT	316348.9	3900532	5.06E-05	9901	DieselExhPM	5.31E-08	70YrCancerDeri	*	5.31E-08	
1420	ALL	RESIDENT	316457.7	3900524	4.78E-05	9901	DieselExhPM	5.01E-08	70YrCancerDeri	*	5.01E-08	
570	**ALL**	**SCHOOL**	**315894.1**	**3899563**	**3.06E-05**	**9901**	**DieselExhPM**	**3.21E-08**	**70YrCancerDer**	*	**3.21E-08**	
1421	ALL	SCHOOL	314597.5	3902835	1.37E-05	9901	DieselExhPM	1.44E-08	70YrCancerDeri	*	1.44E-08	

HARP2 - HRACalc (dated 22118) 4/16/2024 6:45:39 AM - Output Log

GLCs loaded successfully
Pollutants loaded successfully
Pathway receptors loaded successfully
****
RISK SCENARIO SETTINGS

Receptor Type: Resident
Scenario: NCChronic
Calculation Method: Derived

****
EXPOSURE DURATION PARAMETERS FOR CANCER
Exposure duration are only adjusted for cancer assessments

****
PATHWAYS ENABLED

NOTE: Inhalation is always enabled and used for all assessments. The remaining pathways are only used for cancer and noncancer chronic assessments.

Inhalation: True
Soil: False
Dermal: False
Mother's milk: False
Water: False
Fish: False
Homegrown crops: False
Beef: False
Dairy: False
Pig: False
Chicken: False
Egg: False

****
INHALATION

Daily breathing rate: LongTerm24HR

Worker Adjustment Factors
Worker adjustment factors enabled: NO

Fraction at time at home
NOTE: Exposure duration (i.e., start age, end age, ED, & FAH) are only adjusted for cancer assessments.

****
TIER 2 SETTINGS
Tier2 not used.

****

Calculating chronic risk
Chronic risk breakdown by pollutant and receptor saved to: F:\Jobs\41150044HZ\HARP\OpsHRA2\hra\WestsideOpsChronicNCChronicRisk.csv
Chronic risk total by receptor saved to: F:\Jobs\41150044HZ\HARP\OpsHRA2\hra\WestsideOpsChronicNCChronicRiskSumByRec.csv
HRA ran successfully

*HARP - HRACalc v22118 4/16/2024 6:45:39 AM - Chronic Risk - Input File: F:\Jobs\41150044HZ\HARP\OpsHRA2\hra\WestsideOpsChronicHRAInput.hra

REC	GRP	NETID	X	Y	CONC	POLID	POLABBREV	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DI	RESP	SKIN	EYE	BONE/TEET	ENDO	BLOOD	ODOR	GENERAL
1003	**ALL**	**NESTED - PMI**	**316094.1**	**3901263**	**0.000797**	**9901**	**DieselExhPM**	**NonCancerChronicDerived_Inh**	**-**	**-**	**-**	**-**	**-**	**-**	**1.59E-04**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
1398	**ALL**	**RESIDENT**	**316092.7**	**3901224**	**0.000471**	**9901**	**DieselExhPM**	**NonCancerChronicDerived_Inh**	**-**	**-**	**-**	**-**	**-**	**-**	**9.43E-05**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
1399	ALL	RESIDENT	316171.8	3901213	0.000452	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	9.03E-05	-	-	-	-	-	-	-
985	ALL	RESIDENT	316294.1	3901163	0.000332	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	6.63E-05	-	-	-	-	-	-	-
1400	ALL	RESIDENT	316370.7	3901115	0.000238	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	4.76E-05	-	-	-	-	-	-	-
964	ALL	RESIDENT	316194.1	3901063	0.00017	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	3.41E-05	-	-	-	-	-	-	-
1401	ALL	RESIDENT	316081.5	3901009	0.000141	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	2.82E-05	-	-	-	-	-	-	-
996	ALL	RESIDENT	314094.1	3901263	0.000135	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	2.71E-05	-	-	-	-	-	-	-
1402	ALL	RESIDENT	316271.4	3901006	0.000135	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	2.69E-05	-	-	-	-	-	-	-
944	ALL	RESIDENT	316194.1	3900963	0.000118	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	2.36E-05	-	-	-	-	-	-	-
945	ALL	RESIDENT	316294.1	3900963	0.000116	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	2.33E-05	-	-	-	-	-	-	-
1397	ALL	RESIDENT	314352.3	3900458	0.000115	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	2.31E-05	-	-	-	-	-	-	-
1403	ALL	RESIDENT	316340.9	3900952	0.000112	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	2.24E-05	-	-	-	-	-	-	-
1405	ALL	RESIDENT	316274.4	3900910	0.000101	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	2.02E-05	-	-	-	-	-	-	-
1404	ALL	RESIDENT	316177.6	3900899	0.0001	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	2.00E-05	-	-	-	-	-	-	-
1406	ALL	RESIDENT	316339	3900898	9.63E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.93E-05	-	-	-	-	-	-	-
1407	ALL	RESIDENT	316161.7	3900838	8.80E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.76E-05	-	-	-	-	-	-	-
1408	ALL	RESIDENT	316230.7	3900843	8.78E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.76E-05	-	-	-	-	-	-	-
1409	ALL	RESIDENT	316278.6	3900839	8.58E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.72E-05	-	-	-	-	-	-	-
1410	ALL	RESIDENT	316325.2	3900834	8.32E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.66E-05	-	-	-	-	-	-	-
1411	ALL	RESIDENT	316376.3	3900832	8.12E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.63E-05	-	-	-	-	-	-	-
1412	ALL	RESIDENT	316420.5	3900832	7.97E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.59E-05	-	-	-	-	-	-	-
1413	ALL	RESIDENT	316477.7	3900826	7.64E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.53E-05	-	-	-	-	-	-	-
1414	ALL	RESIDENT	316157.7	3900745	7.40E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.48E-05	-	-	-	-	-	-	-
863	ALL	RESIDENT	316094.1	3900563	5.76E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.15E-05	-	-	-	-	-	-	-
1415	ALL	RESIDENT	316255.4	3900600	5.76E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.15E-05	-	-	-	-	-	-	-
1417	ALL	RESIDENT	316170.3	3900530	5.39E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.08E-05	-	-	-	-	-	-	-
1416	ALL	RESIDENT	316442.8	3900600	5.29E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.06E-05	-	-	-	-	-	-	-
1418	ALL	RESIDENT	316261.9	3900530	5.25E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.05E-05	-	-	-	-	-	-	-
1419	ALL	RESIDENT	316348.9	3900532	5.06E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	1.01E-05	-	-	-	-	-	-	-
1420	ALL	RESIDENT	316457.7	3900524	4.78E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	9.56E-06	-	-	-	-	-	-	-
570	**ALL**	**SCHOOL**	**315894.1**	**3899563**	**3.06E-05**	**9901**	**DieselExhPM**	**NonCancerChronicDerived_Inh**	**-**	**-**	**-**	**-**	**-**	**-**	**6.12E-06**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
1421	ALL	SCHOOL	314597.5	3902835	1.37E-05	9901	DieselExhPM	NonCancerChronicDerived_Inh	-	-	-	-	-	-	2.74E-06	-	-	-	-	-	-	-

HARP2 - HRACalc (dated 22118) 4/16/2024 7:00:37 AM - Output Log

GLCs loaded successfully
Pollutants loaded successfully
Pathway receptors loaded successfully
****
RISK SCENARIO SETTINGS

Receptor Type: Worker
Scenario: Cancer
Calculation Method: Derived

****
EXPOSURE DURATION PARAMETERS FOR CANCER

Start Age: 16
Total Exposure Duration: 25

Exposure Duration Bin Distribution
3rd Trimester Bin: 0
0<2 Years Bin: 0
2<9 Years Bin: 0
2<16 Years Bin: 0
16<30 Years Bin: 0
16 to 70 Years Bin: 25

****
PATHWAYS ENABLED

NOTE: Inhalation is always enabled and used for all assessments. The remaining pathways are only used for cancer and noncancer chronic assessments.

Inhalation: True
Soil: True
Dermal: True
Mother's milk: False
Water: False
Fish: False
Homegrown crops: False
Beef: False
Dairy: False
Pig: False
Chicken: False
Egg: False

****
INHALATION

Daily breathing rate: Moderate8HR

Worker Adjustment Factors
Worker adjustment factors enabled: NO

Fraction at time at home
3rd Trimester to 16 years: OFF
16 years to 70 years: OFF

****
SOIL & DERMAL PATHWAY SETTINGS

Deposition rate (m/s): 0.05
Soil mixing depth (m): 0.01
Dermal climate: Mixed

****
TIER 2 SETTINGS
Tier2 not used.

****

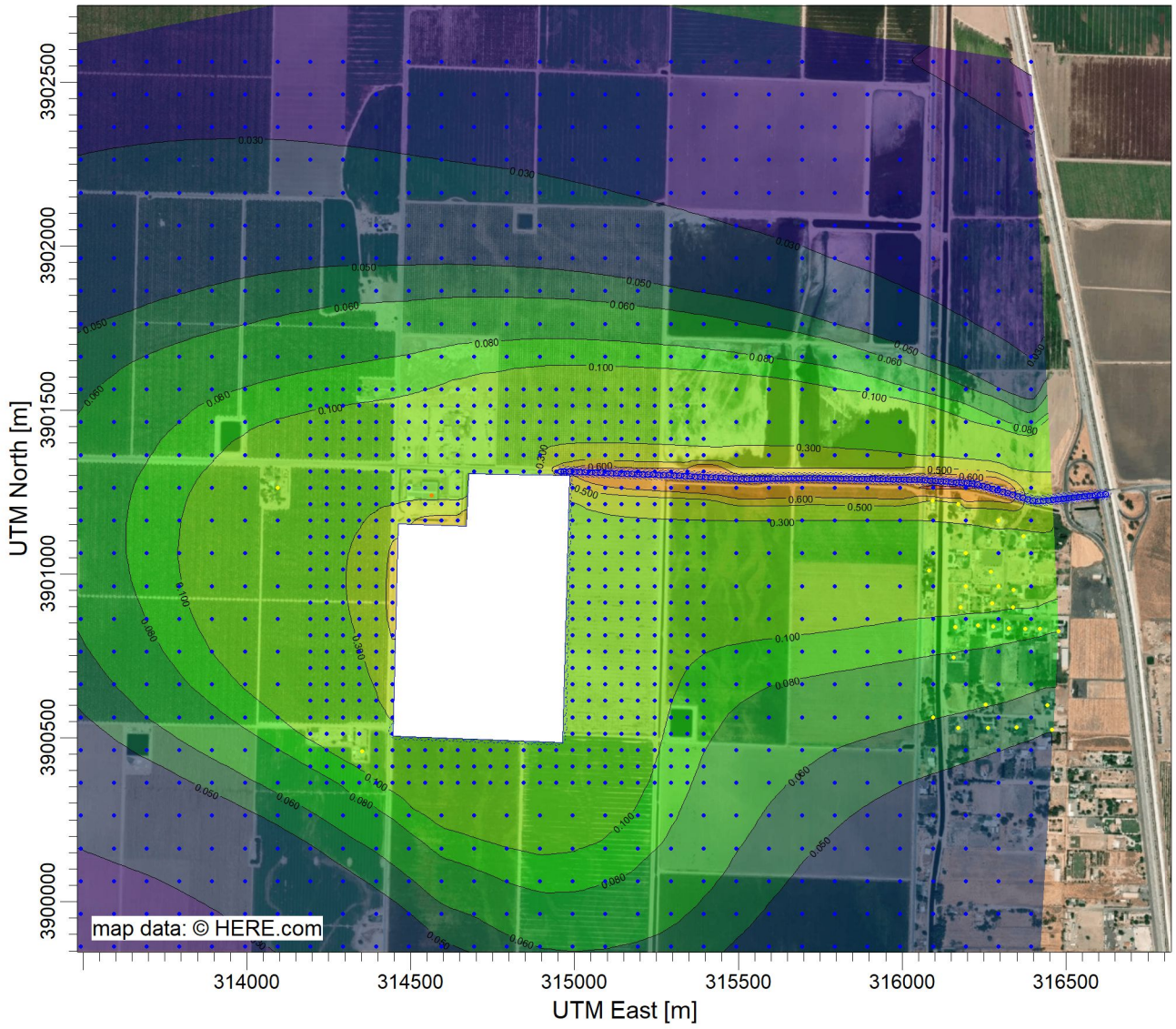
Calculating cancer risk
Cancer risk breakdown by pollutant and receptor saved to: F:\Jobs\41150044HZ\HARP\OpsHRA2\hra\WestsideWorkerCancerCancerRisk.csv
Cancer risk total by receptor saved to: F:\Jobs\41150044HZ\HARP\OpsHRA2\hra\WestsideWorkerCancerCancerRiskSumByRec.csv
HRA ran successfully

*HARP - HRACalc v22118 4/16/2024 7:00:37 AM - Cancer Risk - Input File: F:\Jobs\41150044HZ\HARP\OpsHRA2\hra\WestsideWorkerCancerHRAInput.hra

REC	GRP	NETID	X	Y	CONC	POLID	POLABBREV	RISK_SUM	SCENARIO	DETAILS	INH_RISK
1422	ALL	WORKER	314564.56	3901239.64	0.00025621	9901	DieselExhPM	1.59E-08	25YrCancerDerived_InhSoilDerm	*	1.59E-08

PROJECT TITLE:

Westside Industrial Project
Operational HRA -Residential 70-Year OEHHA Derived Risk



PLOT FILE OF PERIOD VALUES FOR SOURCE GROUP: ALL

Risk/Million

Max: 0.836 [Risk/Million] at (316094.08, 3901262.90)

0.008 0.010 0.030 0.050 0.060 0.080 0.100 0.300 0.500 0.600 0.800 0.836

COMMENTS:	SOURCES: **31**	COMPANY NAME:	
	RECEPTORS: **1422**	MODELER:	
	OUTPUT TYPE: **Concentration**	SCALE: 1:21,000 0 0.5 km	
	MAX: **0.836 Risk/Million**	DATE: **4/16/2024**	PROJECT NO.:

7.3 Responses to Comments

A list of agencies and interested parties who have commented on the Draft EIR is provided below. No Federal Agencies commented on the Draft EIR. A copy of each numbered comment letter and a lettered response to each comment are provided following this list.

Federal Agencies

No Federal comment letters were received.

State Agencies

Comment Letter 1: California Department of Transportation (Caltrans) (February 22, 2024)

Comment Letter 2: California Department of Fish and Wildlife (CDFW) (April 3, 2024)

Comment Letter 3: California Department of Transportation (Caltrans) (April 17, 2024)

Local Agencies

Comment Letter 4: Kern County Superintendent of Schools (February 23, 2024)

Comment Letter 5: Santa Rosa Rancheria (February 27, 2024)

Comment Letter 6: Kern County Fire Department (KCFD) (March 14, 2024)

Comment Letter 7: San Joaquin Valley Air Pollution Control District (April 8, 2024)

Interested Parties

Comment Letter 8: John Borba (March 22, 2024)

Comment Letter 9: Golden State Environmental Justice Alliance(GSEJA) (April 5, 2024)

Attachment: Soil Water Air Protection (SWAPE)

Comment Letter 10: Advocates for the Environment (AFTE) (April 8, 2024)

Federal Agencies

No comment letters were received from Federal agencies for the proposed project.

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State Agencies

Comment Letter 1: California Department of Transportation (Caltrans)

From: Evans, Marcus B@DOT
To: Mark Tolentino
Cc: Deel, David@DOT
Subject: Caltrans has reviewed "KER - 223 - 9.004 - DEIR -Westside industrial project - GPA 21, Map 142, Zcc 69, Map 142, PD 3, Map 142, CUP 75, Map 142, CUP 78, Map 142, ZV 67, Map 142, VTPM 12537, Ag pres 10 Excl, map 142"
Date: Thursday, February 22, 2024 3:54:52 PM

Caltrans has reviewed "KER - 223 - 9.004 - DEIR -Westside industrial project - GPA 21, Map 142, Zcc 69, Map 142, PD 3, Map 142, CUP 75, Map 142, CUP 78, Map 142, ZV 67, Map 142, VTPM 12537, Ag pres 10 Excl, map 142" which "proposed 653,186 sq ft single story warehouse and distribution facility and related improvements on 93.74 acre project site" located at, "the south east corner of Houghton Road and Wible road, south of the city of Bakersfield" and finds this project will have no impact to Caltrans ROW

1-A

Sincerely
https://ld-igr-gts.dot.ca.gov/district/6/report/32008#45444

Marcus Evans
Associate Transportation Planner-Climate Change
California Department of Transportation
District 6-Division of Planning, Local Programs & Environmental Analysis
1352 W. Olive
Fresno, CA
Cell (559) 513-1825

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Response to Comment Letter 1: California Department of Transportation (Caltrans)

1-A: This comment states that the proposed project site plans and maps were reviewed by the commentor. The comment states that the proposed project would not have an impact on the Caltrans right-of-way. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required. The County thanks the commentor for their comments and participation in the public review of the document.

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Comment Letter 2: California Department of Fish and Wildlife (CDFW)

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

April 03, 2024

Mark Tolentino
Kern County Planning and Natural Resources Department
2700 "M" Street Suite 100
Bakersfield California, 93301
(661) 862-5041
tolentinom@kerncounty.com

Subject: Westside Industrial (Project)
Draft Environmental Impact Report (DEIR)
SCH No. 2023100467

Dear Mark Tolentino:

The California Department of Fish and Wildlife (CDFW) received a DEIR from the Kern County Planning and Natural Resources Department (Kern County) for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under Fish and Game Code. 2-A

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statue for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California's Wildlife Since 1870

projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code may be required.

2-A

PROJECT DESCRIPTION SUMMARY

Proponent: Seefried Industrial Properties

Objective: The Westside Industrial Project is a proposal by Seefried Industrial Properties for the construction and operation of a warehouse and distribution facility. The proposed Project would include the construction of an approximately 653,442-squarefoot single-story warehouse and related site improvements, including but not limited to, perimeter security fencing and nighttime directional lighting at the on-site warehouse and distribution facility, new pavement, curb and gutter, and sidewalk on frontage roads with associated signing and markings, office, break and ancillary space.

Project Location: The proposed Project is located on an approximately 93.74-acre portion of an approximately 630-acre parcel, and is bounded by Wible Road (west), Houghton Road (north), and agricultural land (south and east). The Project site is approximately 1.3 miles south of the City of Bakersfield, in unincorporated Kern County.

Timeframe: July 2024 – September 2025

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist Kern County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the CEQA document prepared for this Project.

2-B

In order to adequately assess any potential impact to biological resources, focused biological surveys should be conducted by a qualified wildlife biologist during the appropriate survey period(s) in order to determine whether any special-status species

may be present within the Project area. Properly conducted protocol-level biological surveys, and the information assembled from them, are essential to identify any necessary avoidance measures to fully avoid any potential impacts to these species or the need for CESA take permits along with associated minimization and compensatory mitigation measures, and to identify any Project-related impacts under CEQA. 2-B

I. Environmental Setting and Related Impact

Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or the United States Fish and Wildlife Service (USFWS)?

COMMENT 1: Swainson's Hawk

The section labeled "Swainson's Hawk" on page 4.4-33 of the DEIR describes the potential for Swainson's hawk (SWHA) to occur on the Project site and lists mitigation measures intended to reduce impacts to less than significant. Within Page 4.4-33, the DEIR specifically states that, "To reduce potentially significant impacts to Swainson's hawk, **Mitigation Measures MM 4.4-3,4.4-4, 4.4- 10,** and **4.4-11** shall be implemented, which includes avoidance and minimization construction monitoring and pre-construction clearance surveys, and protocol-level Swainson's hawk surveys to be implemented in accordance with the CDFW Guidelines". While CDFW agrees with conducting protocol surveys according to established CDFW protocols, it does not appear that the DEIR specifies that SWHA protocol-level surveys would be consistent with the survey methods developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC 2000). As such, CDFW recommends that either a new measure be included that specifies SWHA surveys would follow the recommended Swainson's hawk technical advisory committee) protocol (SWHA TAC 2000) or an existing measure be amended to incorporate these recommendations. 2-C

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 the CNDDB. The CNDDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals. 2-D

FILING FEES

If it is determined that the Project has the potential to impact biological resources, an assessment of filing fees will be 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 fee is required 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). 2-E

CDFW appreciates the opportunity to comment on the Project to assist the Kern County Planning and Natural Resources Department in identifying and mitigating the Project's impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). If you have any questions, please contact Jaime Marquez, Environmental Scientist, at the address provided on this letterhead, or by electronic mail at Jaime.Marquez@wildlife.ca.gov. 2-F

Sincerely,

DocuSigned by:
Julie Vance
FA83F09FE08945A...

Julie A. Vance
Regional Manager

ec: State Clearinghouse
Governor's Office of Planning and Research
State.Clearinghouse@opr.ca.gov

REFERENCES

Swainson's hawk technical advisory committee. 2000. Recommended timing and methodology for Swainson's hawk nesting surveys in the central valley of California. Swainson's hawk technical advisory committee.

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Response to Comment Letter 2: California Department of Fish and Wildlife (CDFW)

2-A: This comment is an introductory comment stating that the commentor has reviewed the Draft EIR. The comment states that CDFW is appreciative of the opportunity to provide comments on the proposed project. This comment includes a summary of CDFW as a trustee agency and responsible agency in the CEQA process, as well as a review of the proposed project description.

This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

2-B: This comment introduces CDFW's comments and recommendations on the Draft EIR, which include editorial comments or other suggestions. The comment states that focused, protocol-level conducted biological surveys must be conducted in order to fully assess the potential impacts to biological resources resulting from the proposed project.

Protocol-level biological surveys will be conducted as required by the mitigation measures outlined in the Draft EIR. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

2-C: This comment states that the proposed project does not specify that Swainson's hawk surveys could be consistent with survey methods developed by the Swainson's Hawk Technical Advisory. As such, the comment recommends that Mitigation Measures MM 4.4-3, 4.4-4, 4.4-10, and 4.4-11 be amended or an additional measure be added to specify the survey consistency.

This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and the Draft EIR has been revised such that language regarding Swainson's hawk surveys consistent with survey methods developed by the Swainson's Hawk Technical Advisory has been added to Mitigation Measure MM 4.4-4 as shown below in underline.

MM 4.4-4 If construction activities are conducted during the typical nesting bird season (February 15 through September 15), pre-construction surveys shall be conducted by a qualified Biologist prior to any site preparation and/or construction activity to identify potential nesting bird activity. The survey area shall include a 500-foot buffer surrounding the property. Swainson's hawk <u>protocol-level surveys shall be consistent with the survey methods developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC 2000)</u>. If no active nests are found within the survey area, no further mitigation is required. If nesting activity is identified during the pre-construction survey process, the following measures will be implemented:

a. If active nest sites of bird species protected under the Migratory Bird Treaty Act and/or California Fish and Game Code are observed within the project site, then the project will be modified and/or delayed as necessary to avoid direct take of the identified nests, eggs, and/or young.

b. If active nest sites of raptors and/or bird species of special concern are observed within the vicinity of the project site, then the appropriate buffer around the nest site (typically 250 feet for passerines and 500 feet for raptors) shall be established.

Construction activities in the buffer zone shall be prohibited until the young have fledged the nest and achieved independence.

c. Active nests shall be documented by a qualified Biologist, and a letter report shall be submitted to the Kern County Planning and Natural Resources Department documenting project compliance with the MBTA and California Fish and Game Code.

2-D: This comment states that information developed in the CEQA process be incorporated into a database in accordance with Public Resources Code § 21003, subd. (e). This comment requests that any special-status species in natural communities detected during project surveys be reported accordingly.

Any special-status species detected during project surveys will be reported to CDFW as requested.

2-E: This comment states that if the proposed project has a potential impact to biological resources, an assessment of filing fees will be necessary, payment of which would be required for underlying project approval.

The project proponent will pay all filing fees as required by CDFW. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

2-F: This comment is a conclusion to the comment letter. The commentor is appreciative of the opportunity to comment on the Draft EIR. Links for further information on survey and monitoring protocols for sensitive species are provided, as well as the author's contact information. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required. The County thanks the commentor for their comments and participation in the public review of the document.

Comment Letter 3: California Department of Transportation (Caltrans)

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 6 OFFICE
1352 WEST OLIVE AVENUE | P.O. BOX 12616 | FRESNO, CA 93778-2616
(559) 981-1041 | FAX (559) 488-4195 | TTY 711
www.dot.ca.gov

April 15, 2024

KER-99-15.39
DRAFT EIR - WESTSIDE INDUSTRIAL
GPA 21, ZCC 69, PD 3, CUP 75, CUP 78, ZV 67, MAP 142
AG PRES 10 EXCL, MAP 142
VTPM 12537
GTS #: 45444

SENT VIA EMAIL

Mr. Mark Tolentino, Planner II
Kern County Planning and Natural Resources Department
2700 M street, Suite 100
Bakersfield, CA 93301

Dear Mr. Tolentino:

Caltrans has completed review of the Draft Environmental Impact Report (EIR)which includes in Appendix J: the Traffic Impact Study (TIS) for the Westside Industrial Project. The Project proposes a 653,186 sq ft single story warehouse and distribution facility and related improvements on 93.74-acre project site. The Project site is located on southeast corner of Houghton Road and Wible road, approximately 1.5 miles west of the State Route (SR) 99/Houghton Road interchange, Kern County. 3-A

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Caltrans provides the following comments consistent with the State's smart mobility goals that support a vibrant economy and sustainable communities:

1. Table 6 of the TIS estimates that the proposed Project would generate 4,052 daily trips, with 547 trips (443 inbound/104 outbound) during the a.m. peak hour and 755 trips (294 inbound/461 outbound) during the p.m. peak hour. A Passenger Car Equivalent (PCE) of 3.0 was applied to truck trips to account for additional intersection delay and turn-pocket queue caused by truck trips. The resulting total of 4,341 daily PCE trips, with 573 PCE trips (455 inbound/118 outbound) during the a.m. peak hour and 767 PCE trips (300 inbound/467 outbound) during the p.m. peak hour were analyzed. 3-B

2. Table 11 of the TIS indicates the Level of Service (LOS) for the Project's opening year (2026) plus project conditions, and that the SR 99 NB and SB ramp intersections with Houghton Road will operate at LOS C or better. 3-C

3. Table 14 of the TIS indicates the LOS for the Project's Horizon Year (2046) plus project conditions, and that the SR 99 NB and SB ramp intersections with Houghton Road will operate at LOS C or better. 3-D

4. Caltrans concurs with the estimated Project trip generation, the anticipated trip distribution, and the LOS determination in the TIS of the Draft EIR. 3-E

5. Caltrans concurs with the Draft EIR Transportation and Traffic Mitigation Measures: MM 4.17-1, MM 4.17-2 and MM 4.17-3. 3-F

6. Mitigation Measure MM 4.17-3 requires the Project to "prepare and submit a Construction Traffic Control Plan to Kern County Public Works Department – Traffic Division and the California Department of Transportation Offices for District 6, as appropriate, for approval. The Construction Traffic Control Plan must be prepared in accordance with both the California Department of Transportation Manual on Uniform Traffic Control Devices and Work Area Traffic Control Handbook…" 3-G

7. Please forward the Construction Control Plan to Caltrans District 6 for review and comment when completed. 3-H

If you have any other questions, please call Marcus Evans Associate Transportation Planner at (559) 513-1825 3-I

Sincerely,

Braden Duran

Braden Duran
Acting Branch Chief, Transportation Planning – South

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Response to Comment Letter 3: California Department of Transportation (Caltrans)

3-A: The comment provides a summary of the project description and describes the mission of Caltrans. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

3-B: The comment summarizes the findings of Table 6 of the Traffic Impact Study (TIS) for the project. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

3-C: The comment summarizes the findings of Table 11 of the TIS for the project. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

3-D: The comment summarizes the findings of Table 14 of the TIS for the project. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

3-E: The comment states that Caltrans concurs with the estimated project trip generation, the anticipated trip distribution, and the level of service (LOS) determination in the TIS. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

3-F: The comment states that Caltrans concurs with the Draft EIR Transportation and Traffic Mitigation Measures MM 4.17-1, MM 4.17-2, and MM 4.17-3. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

3-G: The comment summarizes the requirements of MM 4.17-3 and states that the Construction Traffic Control Plan for the project must be prepared in accordance with the California Department of Transportation Manual on Uniform Traffic Control Devices and Work Area Traffic Control Handbook. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

3-H: The comment requests that the Construction Traffic Control Plan is forwarded to Caltrans District 6 for review and comment when it is complete. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

3-I: The comment provides closing remarks and contact information. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary. The County thanks the commentor for their comments and participation in the public review of the document.

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Local Agencies

Comment Letter 4: Kern County Superintendent of Schools

KCSOS
Kern County Superintendent of Schools
Office of John G. Mendiburu, Ed.D. — Advocates For Children

February 23, 2024

Kern County Planning Department
Attn: Mark Tolentino, Planner I
2700 M Street, Suite 100
Bakersfield, CA 93301

Our File No.: CO24-0016

RE: DEVELOPER FEES FOR: Draft Environmental Impact Report; Westside Industrial Project
Map No. 142-13
(Southeast corner of Houghton Rd and Wible Rd intersection)

Dear Mr. Tolentino,

This office represents the General Shafter Elementary and Kern High School Districts with regard to the imposition of school facility fees, and appreciates the opportunity to respond on behalf of the districts regarding the proposed project. This letter is limited to addressing the possible effects which the project might have on school facilities created by students attributable to the project. It is not intended to address other possible environmental concerns which might be identified by the district(s) after reviewing it. 4-A

It is our determination that the above-mentioned project proposing a 653,442-square foot single-story warehouse and distribution facility and related improvements on a proposed 93.74-acre project site to include an on-site wastewater treatment plant, temporary concrete batch plant during construction, on-site substation, two guardhouses and one pumphouse will have no significant effects on either of these district's facilities and mitigation of this project's impacts on public school facilities will be limited to the collection of statutory fees authorized under Education Code Section 17620 and Government Code Sections 65995 et seq. (all as amended with an operative date of November 4, 1998) at the time that building permits are issued. Currently, these fees are set at $0.78 per square foot, an amount subject to COLA adjustment every two years with 2024 being an adjustment year. 4-B 4-C

Thank you for the opportunity to comment on the project. Should you have any questions, or if we can be of any further assistance in this matter, please contact me at 636-4599, or through e-mail at anwatson@kern.org. 4-D

Sincerely,

awatson

Andrea Watson, Specialist
School District Facility Services

RECEIVED
MAR 04 2024
Kern County Planning & Natural Resources Dept.

Cc: Districts

1300 17th Street, CITY CENTRE • Bakersfield, CA 93301-4533 • (661) 636-4000 • FAX (661) 636-4130 • kern.org

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Response to Comment Letter 4: Kern County Superintendent of Schools

4-A: This is an introductory comment stating that the commentor represents the General Shafter Elementary and Kern High School Districts and appreciates the opportunity to respond to the proposed project. This comment is limited to addressing impacts to school facilities. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required.

4-B: This comment states that the proposed project would not have a significant impact on the school district's facilities. Mitigation will be limited to the collection of statutory impact fees at the time of issuance of building permits. The proposed project will incorporate a condition of approval requiring the payment of all statutory fees. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required.

4-C: This comment states that statutory impact fees under Education Code section 17620 and Government Code Sections 65995 et seq. are set at $0.78 per square foot and set to be adjusted in 2024. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required.

4-D: This comment is a conclusion to the comment letter. The commentor is appreciative of the opportunity to comment on the proposed project. Contact information for further questions or assistance are provided. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required. The County thanks the commentor for their comments and participation in the public review of the document.

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Comment Letter 5: Santa Rosa Rancheria Tachi Yokut Tribe

From: Nichole Escalon
To: Mark Tolentino
Cc: Shana Powers; Samantha McCarty
Subject: Westside Industrial Project by Seefried Industrial Properties
Date: Tuesday, February 27, 2024 11:32:12 AM

CAUTION: This email originated from outside of the organization. Do not click links, open attachments, or provide information unless you recognize the sender and know the content is safe.

Dear Mark,
Thank you for contacting the Santa Rosa Rancheria Tachi Yokut Tribe regarding the Westside Industrial Project by Seefried Industrial Properties. Due to the location of this project the tribe will be deferring to the more local tribes of the area. If you have any questions, comments and or concerns please reach or to myself or the SRR Cultural Department. Thank you.

5-A

Nichole Escalon
Cultural Monitor Specialist 1
Santa Rosa Rancheria Tachi Yokut Tribe
(559) 924-1278 x 4092

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Response to Comment Letter 5: Santa Rosa Rancheria Tachi Yokut Tribe

5-A: The commenter states that, due to the location of the proposed project, the author is deferring to more local tribes in the area. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required. The County thanks the commentor for their comments and participation in the public review of the document.

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Comment Letter 6: Kern County Fire Department (KCFD)

Office of the Fire Marshal
Kern County Fire Department
Fire Prevention Unit

2820 M St. • Bakersfield, CA 93301 • www.kerncountyfire.org
Telephone 661-391-3310 • FAX 661-636-0466/67 • TTY Relay 800-735-2929

March 14, 2024

Kern County Planning and Natural Resources Department
2800 M St., Bakersfield, CA 93301
Attn: **Mark Tolentino, Planner II**

Re: Kern County Fire Department Comments Regarding Planning Department Project

To Whom It May Concern:

The Kern County Fire Department (KCFD), as the local fire authority, has received a request for comments regarding **Westside Industrial Project.** Upon initial review, it has been determined that all new construction will require fire water flowing a minimum 1,500 GPM for 2 hours with 20 PSI residual. All fire access roads to each parcel must meet specifications set forth in Section 503.2 of the California Fire Code and the applicable Appendix and Ordinance sections. Any structures that exceed 10,000 square feet will require fire sprinklers and a fire alarm to be installed. 6-A

A more detailed review and project comments will be conducted when the building permit is obtained, and plans are submitted to KCFD. 6-B

Please feel free to call our Fire Prevention Office at (661) 391-3310 with any questions.

Respectfully,
Roxanne Routh
Assistant Fire Marshal
Kern County Fire Department

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Response to Comment Letter 6: Kern County Fire Department

6-A: This is an introductory comment which states that KCFD has reviewed the proposed project. The comment states that all new construction is required to fire water flow standards, and all fire access roads must meet specifications set forth in Section 503.2 of the CFC, and structures exceeding 10,000 square feet will require fire sprinklers and a fire alarm to be installed.

The proposed project would comply with all KCFD requirements, including fire water flow standards, access road requirements, fire sprinkler, and fire alarm installation requirements. A condition of approval will be imposed on this project to ensure compliance with the listed KCFD requirements. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required.

6-B: The commenter states that further review and comment will be conducted when the building permit is obtained and plans are submitted to KCFD. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required.

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Interested Parties

Comment Letter 7: San Joaquin Valley Air Pollution Control District

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

April 8, 2024

Mark Tolentino
Kern County
Planning and Natural Resources Department
2700 "M" Street, Suite 100
Bakersfield, CA, 93301

Project: Draft Environmental Impact Report for the Westside Industrial Project (SCH# 2023100467)

District CEQA Reference No: 20240221

Dear Mr. Tolentino:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (DEIR) from the County of Kern (County) for the Westside Industrial Project. Per the DEIR, the project consists of the construction and operation of a 653,442-square-foot single-story warehouse and distribution facility, an on-site wastewater treatment plant, temporary concrete batch plant during construction, on-site substation, and off-site road improvements (Project). The Project is located at the southeast corner of the Houghton Road and Wible Road intersection in unincorporated Kern County. 7-A

The District offers the following comments at this time regarding the Project:

1) **Construction Emissions**

The District recommends, to further reduce impacts from construction-related diesel exhaust emissions, the Project should utilize the cleanest available off-road construction equipment. 7-B

2) **Health Risk Screening/Assessment**

The District reviewed the Health Risk Assessment (HRA) for the Project and has the following comments: 7-C

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

www.valleyair.org www.healthyairliving.com

- The HRA uses the Intake Rate Percentile selection "Risk Management Policy (RMP)" in the HARP2 risk analysis tool. The District recommends always using the "OEHHA Derived Method" selection.
- The HRA air dispersion modeling combined 24 emissions units into one source group, where the distance between some emission points is 200 meters. The District advises against grouping of sources that are considerably distant from each other.

7-C

The District recommends incorporating the above revisions into the HRA to ensure the accuracy of the results presented in the DEIR and alignment with District modeling recommendations.

3) <u>Industrial/Warehouse Emission Reduction Strategies</u>

The District recommends the County incorporate emission reduction strategies that can reduce potential harmful health impacts, such as those listed below:

- Require cleanest available heavy-duty trucks (see comment 5)
- Require HHD truck routing patterns that limit exposure of residential communities and sensitive receptors to emissions (see comment 4)
- Orient loading docks away from sensitive receptors unless physically impossible
- Require loading docks a minimum of 300 feet away from the property line of sensitive receptor unless dock is exclusively used for electric trucks
- Incorporate signage and "pavement markings" to clearly identify on-site circulation patterns to minimize unnecessary on-site vehicle travel
- Ensure rooftop solar panels are installed and operated to supply 100% of the power needed to operate all non-refrigerated portions of the development project
- Require the use of low volatile organic compounds (VOC) architectural and industrial maintenance coatings
- Designate an area during construction to charge electric powered construction vehicles and equipment, if temporary power is available
- Prohibit the use of non-emergency diesel-powered generators during construction
- Inform the project proponent of the incentive programs (e.g., Carl Moyer Program and Voucher Incentive Program) offered to reduce air emissions from the Project

7-D

4) Truck Routing

Truck routing involves the assessment of which roads Heavy Heavy-Duty (HHD) trucks take to and from their destination, and the emissions impact that the HHD trucks may have on residential communities and sensitive receptors. Per the DEIR, the Project includes a warehouse and a distribution facility, which will result in HHD truck trips.

The District recommends the County evaluate HHD truck routing patterns for the Project, with the aim of limiting exposure of residential communities and sensitive receptors to emissions. This evaluation would consider the current truck routes, the quantity and type of each truck (e.g., Medium Heavy-Duty, HHD, etc.), the destination and origin of each trip, traffic volume correlation with the time of day or the day of the week, overall Vehicle Miles Traveled (VMT), and associated exhaust emissions. The truck routing evaluation would also identify alternative truck routes and their impacts on VMT and air quality. 7-E

5) Cleanest Available Heavy-Duty Trucks

The San Joaquin Valley will not be able to attain stringent health-based federal air quality standards without significant reductions in emissions from HHD trucks, the single largest source of NOx emissions in the San Joaquin Valley. Accordingly, to meet federal air quality attainment standards, the District's ozone and particulate matter attainment plans rely on a significant and rapid transition of HHD fleets to zero or near-zero emissions technologies. 7-F

The Project includes a warehouse and a distribution facility, which will result in HHD truck trips, including HHD trucks traveling to-and-from further trip length distances for distribution. The District recommends that the following measures be considered by the County to reduce Project-related operational emissions:

- *Recommended Measure*: Fleets associated with operational activities utilize the cleanest available HHD trucks, including zero and near-zero technologies.

6) Electric Infrastructure for Heavy-Duty Trucks

The Project includes a warehouse and a distribution facility, which will result in HHD truck trips. As such, the District recommends incorporating electric infrastructure specifically to support the use of on-road zero emissions vehicles, particularly HHD trucks. This would entail installing charging infrastructure for current and future transition to zero emission trucks associated with the Project. 7-G

By requiring such infrastructure as part of the Project, the County can contribute to reducing emissions from HHD trucks and support the overall efforts to improve air quality in the region, along with ensuring upcoming regulation mandate standards

are met. This proactive approach can help mitigate the environmental impact of the Project and contribute to the broader goal of sustainable development.

To support and accelerate the installation of electric vehicle charging equipment and development of required infrastructure, the District offers incentives to public agencies, businesses, and property owners of multi-unit dwellings to install electric charging infrastructure (Level 2 and 3 chargers). The purpose of the District's Charge Up! Incentive program is to promote clean air alternative-fuel technologies and the use of low or zero-emission vehicles. 7-G

Please visit https://ww2.valleyair.org/grants/charge-up for more information.

7) District Rules and Regulations

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes. 7-H

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (661) 392-5665.

7a) District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources

Stationary Source emissions include any building, structure, facility, or installation, which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 (New and Modified Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT). 7-I

This Project may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District

7d) District Rule 4601 (Architectural Coatings)

The Project will be subject to District Rule 4601 since it is expected to utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at: https://ww2.valleyair.org/media/tkgjeusd/rule-4601.pdf

7-L

7e) District Regulation VIII (Fugitive PM10 Prohibitions)

The project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities.*

Should the project result in at least 1-acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950.

7-M

The application for both the Construction Notification and Dust Control Plan can be found online at: https://ww2.valleyair.org/media/fm3jrbsq/dcp-form.docx

Information about District Regulation VIII can be found online at: https://ww2.valleyair.org/dustcontrol

7f) Other District Rules and Regulations

The Project may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

7-N

7d) District Rule 4601 (Architectural Coatings)

The Project will be subject to District Rule 4601 since it is expected to utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at: https://ww2.valleyair.org/media/tkgjeusd/rule-4601.pdf

7-L

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7-M

The application for both the Construction Notification and Dust Control Plan can be found online at: https://ww2.valleyair.org/media/fm3jrbsq/dcp-form.docx

Information about District Regulation VIII can be found online at: https://ww2.valleyair.org/dustcontrol

7f) Other District Rules and Regulations

The Project may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

7-N

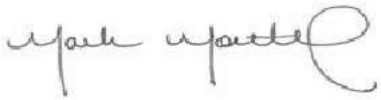
8) District Comment Letter

The District recommends that a copy of the District's comments be provided to the Project proponent. 7-O

If you have any questions or require further information, please contact Michael Corder by e-mail at Michael.Corder@valleyair.org or by phone at (559) 230-5818.

Sincerely,

Tom Jordan
Director of Policy and Government Affairs



Mark Montelongo
Program Manager

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Response to Comment Letter 7: San Joaquin Valley Air Pollution Control District

7-A: This comment provides introductory remarks and summarizes the project. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required.

7-B: This comment states that the District recommends that the project utilize the cleanest available construction equipment to further reduce impacts from construction-related diesel exhaust emissions.

The project will comply with all applicable local, State and federal requirements regulating emissions. Likewise, all on-site service equipment will meet applicable statewide regulations. Table 4.3-4 of the Draft EIR shows that construction emissions would not exceed SJVAPCD thresholds, and that impacts would be less than significant. Furthermore, the proposed project would use tier 3 engines and die and diesel particulate filters on all construction equipment when available, as required by Mitigation Measure MM 4.3-3. Therefore, there is no legal nexus to require additional measures such as requiring the cleanest available construction equipment to further reduce construction impacts. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required.

7-C: This comment summarizes information in the project-specific HRA related to the Intake Rate Percentile selection used in the HARP2 risk analysis tool, stating that the District recommends always using the OEHHA Derived Method selection.

This comment also states that the HRA air dispersion modeling combined 24 emissions units into one source group, where the distance between some of the emission points is 200 meters. The District advises against grouping of sources that are considerably distant from each other. The District recommends incorporating the revisions described in the comment into the HRA.

For clarification and consistency purposes, the HRA HARP Modeling was updated to reflect use of OEHHA-Derived risk exposure parameters for all scenarios. Accordingly, modeling changes were made for residential and school receptor scenarios. The construction HRA results remain unchanged since the Risk Management Policy (RMP) method for ages less than 2 years is equivalent to the OEHHA Derived approach for a single pathway. However, modeling was updated to indicate consistency with the District-recommended OEHHA Derived approach. The operational modeling runs for residential/school exposure scenarios were also updated to reflect the district's policy of OEHHA derived risk estimates.

Idling trucks at warehouse dock doors were initially modeled in AERMOD as 24 identical individual point (truck exhaust stack) sources, placed at 30-meter intervals on the east (9), north (6) and west (9) sides of the building in loading dock areas. Each of these represents approximately 6 bays as the dock doors are generally clustered in sets of 6. It was assumed that the truck activity was 40 percent on the east and 40 percent west docks and 20 percent at the north docks based on the number of dock doors and proximity to parking areas. However, for clarification purposes, these groups have been reassigned and remodeled in the AERMOD and HARP modeling into smaller groups representing west, east and north dock groups. The changes do not increase the resultant pollutant concentrations, but merely provides a more transparent and spatially consistent approach

to the modeling. However, the changes related the OEHHA-Derived method slightly increases the residential breathing rate for the operation scenario, which slightly increases health risks.

As shown in Table 4.3-9 in the Errata, the cancer point-of-maximum-impact (PMI) risk is increased nominally from 0.67 in a million to 0.84 in a million. Cancer maximum exposed individual resident (MEIR) risk is increased nominally from 0.40 in a million to 0.49 in a million. Cancer sensitive risk is increased nominally from 0.02 in a million to 0.03 in a million.

The revised health risks are still substantially below SJVAPCD's threshold of 20 in a million. Therefore, the changes do not affect the project's significance conclusions.

The updated modeling is provided within Appendix B – Health Risk Appendix Supporting Information of the B-1 Air Quality, Greenhouse Gas Emissions, and Energy Analysis Report. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required.

7-D: This comment provides a list of reduction strategies that are suggested to be implemented by the County to reduce potential harmful health impacts.

As noted in Response to Comment 7-C, health risks are substantially below SJVAPCD's thresholds and no further mitigation is necessary to reduce impacts to below a level of significance. Nonetheless, it is notable that the proposed project would be implementing numerous best practices from the Attorney General's Warehouse Projects Best Practices Memorandum, as shown in Section 4.8, Greenhouse Gas Emissions, of the Draft EIR. Applicability of the recommended reduction strategies are included in the table below.

Comment's Recommended Reduction Strategy	**Project Inclusion/Applicability**
Require cleanest available heavy-duty trucks.	The proposed project would use Tier 3 engines and diesel particulate filters on all construction equipment when available, as required by Mitigation Measure MM 4.3-3. As demonstrated in Table 4.3-7 of the Draft EIR, the proposed project would not exceed SJVAPCD screening thresholds for requiring additional ambient air quality modeling, the proposed project's localized criteria pollutant impacts from operation are less than significant. Therefore, there is no legal nexus to require additional measures such as use of cleanest available HHD truck fleet to reduce project-related operational emissions. Further, with compliance with ARB regulations such as Advanced Clean Fleet, it is assumed that over the lifetime of the project, HHD truck fleets travelling to and from the project will include increasingly zero and near-zero technologies as the project moves to later years.
Require HHD truck routing patterns that limit exposure of residential communities and sensitive receptors to emissions.	Trucks as part of the proposed project would utilize designated truck routes as specified by the County.
Orient loading docks away from sensitive receptors unless physically impossible.	Recommendation is noted. However, the current design of the proposed project is shown to have less than significant criteria pollutants and health risk impacts. Further, as discussed below, the loading docks would

Comment's Recommended Reduction Strategy	Project Inclusion/Applicability
	be located within 300 feet from the property line of sensitive receptors. Landscaping would provide an additional buffer between loading docks and sensitive receptors.
Require loading docks a minimum of 300 feet away from the property line of sensitive receptor unless dock is exclusively used for electric trucks.	This recommendation is incorporated into the project design. Loading docks would not be located within 300 feet of the property line of sensitive receptors.
Incorporate signage and "pavement markings" to clearly identify on-site circulation patterns to minimize unnecessary on-site vehicle travel.	This recommendation is incorporated into the project design. Signage would be located at the project site to restrict inbound and outbound vehicles, as noted in Section 4.17, Transportation and Traffic of the Draft EIR. Furthermore, as required under Mitigation Measure MM 4.17-3, a Construction Traffic Control Plan will be prepared for the project, which would require the placement of signage during construction.
Ensure rooftop solar panels are installed and operated to supply 100% of the power needed to operate all non-refrigerated portions of the development project.	The 2022 Building Energy Efficiency Standards (Energy Code) has solar photovoltaic (solar PV) system requirements for all newly constructed nonresidential buildings. Pursuant to Energy Code Section 140.10, The required solar PV system is intended to offset the annual electrical consumption of a mixed-fuel building such that it will self-utilize about 80 percent of the annual solar PV generation without battery storage, and about 90 percent with battery storage, over a year. The recommended mitigation would not clearly lessen any significant environmental impacts, nor is the recommended mitigation considerably different from the mitigation measure already evaluated in the Draft EIR.
Require the use of low volatile organic compounds (VOC) architectural and industrial maintenance coatings.	The proposed project would be consistent with this strategy by complying with SJVACPD Rule 4601 Architectural Coatings.
Designate an area during construction to charge electric powered construction vehicles and equipment, if temporary power is available.	As required by MM 4.3-3 (D), electric equipment shall be used whenever possible in lieu of diesel- or gasoline-powered equipment. The recommended mitigation would not clearly lessen any significant environmental impacts, nor is the recommended mitigation considerably different from the mitigation measure already evaluated in the Draft EIR.
Prohibit the use of non-emergency diesel-powered generators during construction.	There is no nexus to require additional measures such as non-diesel powered stand-by generators, as impacts related to localized emissions and health risks would be less than significant as previously detailed. Thus, this measure is not included or required for the proposed project.
Inform the project proponent of the incentive programs (e.g., Carl Moyer Program and Voucher Incentive Program) offered to reduce air emissions from the Project.	The project proponent will be informed of these incentive programs.

The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required.

7-E: This comment recommends that the County evaluate Heavy Heavy-Duty truck routing patterns for the project with the aim of limiting exposure of residential communities and sensitive receptors to emissions. This evaluation would consider the current truck routes, the quantity and type of each truck (e.g., Medium Heavy-Duty, HHD, etc.), the destination and origin of each trip, traffic volume correlation with the time of day or the day of the week, overall Vehicle Miles Traveled (VMT), and associated exhaust emissions. The truck routing evaluation would also identify alternative truck routes and their impacts on VMT and air quality.

Table 4.3-9 of the Draft EIR shows the operation of the proposed project would not result in increased cancer risk or hazard index in excess of SJVAPCD's significance thresholds. Overall, impacts associated with the proposed project's potential to expose sensitive receptors to substantial TACs during operation of the proposed project would be less than significant. Furthermore, the proposed project would have a significant VMT impact, which is based on employee travel (and not truck transportation), and all feasible mitigation measures that have the ability to reduce that impact have been considered and incorporated. Additional evaluation of truck routing patterns would not reduce the project's VMT impact. Therefore, there is no legal nexus to require additional measures such as further evaluation of truck routing patterns beyond the transportation analysis prepared for the Draft EIR. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required.

7-F: This comment recommends that a measure requiring fleets associated with operational activities to utilize the cleanest available HHD trucks, including zero and near-zero technologies be considered by the County to reduce project-related operational emissions.

Comment noted. As demonstrated in Table 4.3-7 of the Draft EIR, the proposed project would not exceed SJVAPCD screening thresholds for requiring additional ambient air quality modeling, the proposed project's localized criteria pollutant impacts from operation are less than significant. Therefore, there is no legal nexus to provide additional measures such as requiring use of cleanest available HHD truck fleet to reduce project-related operational emissions. Further, with compliance with ARB regulations such as Advanced Clean Fleet, it is assumed that over the lifetime of the project, HHD truck fleets travelling to and from the project will include increasingly zero and near-zero technologies as the project moves to later years. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required.

7-G: This comment recommends incorporating electric infrastructure specifically to support the use of on-road zero emissions vehicles, particularly HHD trucks. This would entail installing charging infrastructure for current and future transition to zero emission trucks associated with the project. The comment states that by requiring such infrastructure as part of the project, the County can contribute to reducing emissions from HHD trucks and support the overall efforts to improve air quality in the region, along with ensuring upcoming regulation mandate standards are met,

The comment states that to support and accelerate the installation of electric vehicle charging equipment and development of required infrastructure, the District offers incentives to public agencies, businesses, and property owners of multi-unit dwellings to install electric charging

infrastructure (Level 2 and 3 chargers), and provides information on the Districts Charge Up! Incentive Program.

As noted in Chapter 3, Project Description of the Draft EIR, the proposed project would include 200 Electric Vehicle Charging Stations (EVCS), 50 Electric Vehicle Supply Equipment (EVSE) stalls, and 50 accessible EVCS stalls. CALGreen 2022 update requires loading to the future location of the charging for medium- and heavy-duty ZEVs. For warehouses with greater than 256,000 square feet such as the proposed Project, 400 KVA of additional capacity required for raceway, busway, transformer, and panel. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required.

7-H: This comment states that the District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. This comment provides general information related to the District's rules and regulations. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required

7-I: This comment provides a summary of the requirements of District rules 2010 (Permits Required) and 2201 (New and Modified Stationary Source Review). The comment further states that prior to construction the project proponent should submit an application for an Authority to Construct (ATC) from the District.

The project proponent will submit an application for ATC as requested by the District. No changes to the Draft EIR are required. The comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required.

7-J: This comment states that the project is submitted to District Rule 9510 – Indirect Source Review (ISR) because it will receive a project-level discretionary approval from a public agency and will equal or exceeds 25,000 square feet of light industrial space. This comment provides a summary of the requirements of District Rule 9510. The comment states that the ISR Rule requires developers to mitigate their NOx and PM emissions by incorporating clean air design elements into their projects. Should the proposed development project clean air design elements be insufficient to meet the required emission reductions, developers must pay a fee that funds incentive projects to achieve off-site emissions.

The comment states that according to Section 5.0 of the ISR rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency. The comment states that the District has not received an AIA application for the project, and requests immediate submittal of an AIA application to the District to comply with District Rule 9510.

The proposed project would comply with this rule. Under the DMA delineated in Mitigation Measure 4.3-5, the project owner/operator is required to pay fees to fully mitigate construction and operational emissions. The fuel emission mitigation will be documented in the ISR application to be submitted to the District. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

7-K: The District indicates that the proposed project will be subject to District Rule 9410 (Employer Based Trip Reduction) if the project would result in employment of 100 or more "eligible" employees. District Rule 9410 requires employers with 100 or more "eligible" employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes. Under an eTRIP plan, employers have the flexibility to select the options that work best for their worksites and their employees. The comment provides a website, phone number, and email for additional information about District Rule 9410.

The proposed project would employ approximately 915 on-site employees per shift (two shifts, for a total of 1,830 employees) in peak season and approximately 732 on-site employees per shift (two shifts for a total of 1,464 employees) in non-peak season during, and would therefore be subject to District Rule 9410. The project proponent will establish an eTRIP to reduce pollutant emissions associated with employee commutes. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

7-L: The comment states that the proposed project will be subject to District Rule 4601 since it is expected to utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements.

The proposed project would comply with District Rule 4601 and utilize low VOC architectural coatings.

7-M: The comment states that the project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 – Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities. The comment further states that if the project is at least one acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the proponent's intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). The comment provides additional information about the Dust Control Plan online and via telephone.

The project proponent will submit a Dust Control Plan as required by The District and outlined under Mitigation Measure MM 4.3-2. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

7-N: This comment states that the project may also be subject to Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

The proposed project will comply with Rule 4102 and Rule 4641 during construction and operation. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

7-O: This comment requests that a copy of the comments be provided to the project proponent and provides closing remarks and contact information for appropriate SJVAPCD staff. The comments have been forwarded to the project proponent. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary. The County thanks the commentor for their comments and participation in the public review of the document.

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Comment Letter 8: John Borba

From: John Borba
To: Mark Tolentino
Subject: Oppostion to Westside Industrial Project
Date: Friday, March 22, 2024 5:05:54 PM

CAUTION: This email originated from outside of the organization. Do not click links, open attachments, or provide information unless you recognize the sender and know the content is safe.

March 22, 2024

Kern County Planning and Natural Resources Department
ATTN: Mark Tolentino, Planner II
2700 "M" Street, Suite 100, Bakersfield, CA 93301

Dear Mr. Tolentino:

I am writing to express my opposition of the proposed Westside Industrial Project to be located at the southeast corner of the Houghton Road and Wible Road intersection south of Bakersfield. Construction of this facility will negatively impact the lives of the current inhabitants of the surrounding area. This facility will bring an around the clock increase in traffic, noise, truck exhaust, and bright lights. 8-A

I ask that you consider a past situation in the county. There used to be a facility called the Mesa Marin Speedway which had been located in a rural area northeast of Bakersfield. The racetrack had been in operation for many years. Eventually housing tracts were built around the speedway. The inhabitants who moved into those new homes complained about the noise from the racetrack during its weekend races even though the speedway was there first. Eventually, the speedway was forced to close down. Those people chose to move into homes next to an existing speedway after the fact and they were allowed to force its closure. Those of us who live in the area of the proposed Westside Industrial Project should have more rights than the Mesa Marin complainers for keeping this facility out as we live here and they want to build near us, not vice versa. 8-B

Sincerely,

John Borba
13500 South H Street
Bakersfield, CA

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Response to Comment Letter 8: John Borba

8-A: This comment states the author's opposition to the proposed project, stating that it will negatively impact the lives of the current residents of the surrounding area. The author mentions potential impacts regarding light and glare, air quality, noise, and transportation generated by the proposed project. These issues are described and analyzed in detail in the Draft EIR. The comment does not raise any specific issues related to these topical areas of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not required.

8-B: This comment draws comparisons to the Mesa Marin speedway and the ability for the public to comment on development within the City's Planning Area. The comment does not raise a substantive issue on the content of the Draft EIR. Additionally, the Draft EIR evaluated the proposed project's potential impact on established communities and consistency with land use plans. Table 4.11-2, Consistency Analysis with Metropolitan Bakersfield General Plan for Land Use, presents an evaluation of the project's consistency with the Metropolitan Bakersfield General Plan. The table lists the goals and policies identified above in the regulatory setting and provides analysis on the project's general consistency with overarching policies. Additionally, the table provides goals and policies of issue areas that are presented in more detail in other sections of the EIR. As evaluated in detail in Table 4.11-2, the project is consistent with the goals and policies of the Metropolitan Bakersfield General Plan. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary. The County thanks the commentor for their comments and participation in the public review of the document.

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Comment Letter 9: Golden State Environmental Justice Alliance (GSEJA)

BLUM, COLLINS & HO LLP
ATTORNEYS AT LAW
AON CENTER
707 WILSHIRE BOULEVARD
SUITE 4880
LOS ANGELES, CALIFORNIA 90017 (213) 572-0400

April 5, 2024

Mark Tolentino, Planner II
Kern County Planning and Natural Resources Department
2700 M Street Suite 100
Bakersfield, CA 93301

VIA EMAIL TO:
TolentinoM@kerncounty.com

SUBJECT: COMMENTS ON WESTSIDE INDUSTRIAL PROJECT BY SEEFRIED INDUSTRIAL PROPERTIES EIR (SCH NO. 2023100467)

Dear Mr. Tolentino

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Westside Industrial Project by Seefried Industrial Properties. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

1.0 Summary 9-A

The project proposes the construction and operation of a 653,442-square-foot single-story warehouse and distribution facility and related improvements on a proposed 93.74-acre project site. The facility would receive and consolidate products from vendors and then ship these products to other fulfillment centers within the network. The proposed facility has a footprint of approximately 629,186 square feet (including approximately 44,424 square feet of office space) that would primarily facilitate material handling equipment and warehouse uses. The remaining square footage is made up of a 24,256-square-foot mezzanine, which contains material handling equipment conveyors with occasional maintenance and no storage. The proposed project would also include an on-site wastewater treatment plant, temporary concrete batch plant during construction, on-site electricity substation, two guardhouses and one pumphouse, and all associated on-site improvements such as lighting, parking and landscaping. The proposed project

would also include approximately 5.54 acres of off-site improvements, along Houghton Road and Wible Road.

The following discretionary actions are required to implement the proposed project:

1. Amendment to the Land Use Element of the Metropolitan Bakersfield General Plan from Map Code RIA (Intensive Agriculture – minimum 20-acre parcel size) to LI (Light Industrial) for approximately 93.74 acres (GPA No. 21, Map 142).
2. Change in Zone Classification from A (Exclusive Agriculture) to M-1 PD (Light Industrial Precise Development Combining), or a more restrictive district, on approximately 93.74 acres (ZCC No. 69, Map 142).
3. Approval of Precise Development Plan No. 3, Map 142 for site development and implementation of the M-1 PD zoning request.
4. Conditional Use Permit to allow for the construction and operation of a permanent on-site wastewater treatment facility (Section 19.36.030 H) in the M-1 (Light Industrial) District (CUP No. 75, Map 142).
5. Conditional Use Permit to allow for the construction and operation of a temporary concrete batch plant (Section 19.36.030 C.1) in the M-1 (Light Industrial) District (CUP No. 78, Map 142).
6. Zone Variance to authorize a 9.63-acre (gross) parcel where 20 acres (gross) is required (Section 19.12.050) in the A (Exclusive Agriculture) District (ZV No. 67, Map 142).
7. Tentative Parcel Map No. 12537 proposing the division of a 642.68-acre parcel into a 9.63-acre (gross) parcel, a 97.70-acre (gross) parcel and a 535.35-acre (gross) Designated Remainder which may be processed concurrently with, or subsequent to, other project entitlements.
8. An Agricultural Exclusion of 93.74 acres within the boundaries of Agricultural Preserve No. 10, Zone Map No. 142.

9-A

1.1 Project Piecemealing

The EIR does not accurately or adequately describe the project, meaning **"the** whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the **environment"** (CEQA § 15378). The project proposed by Westside Industrial by Seefried Industrial Properties is a piecemealed portion of a larger overall project to be developed within the larger Seefried Industrial/Ware Malcomb Industrial Center in the project vicinity. This is notable as cumulative project 14 listed in Table 3-5 indicates that a similar project application has been submitted on the larger overall 642.68 acre parcel that encompasses the project site to construct a **"3,417,199**-square-foot multi-story

9-B

warehouse and distribution facility and related improvements, on approximately 69 acres," and the NOP for this project is also available on the County's website[1]. It is clear that the development plans for the entirety of the 642.68 acre parcel have been established and split into several smaller development projects in order to artificially reduce environmental impacts.

CEQA § 15165 - Multiple and Phased Projects requires that "Where individual projects are, or a phased project is, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the Lead Agency shall prepare a single program EIR for the ultimate project as described in Section 15168." The MND misleads the public and decision makers by circumventing adequate and accurate environmental analysis for the whole of the action - construction and operation of all First Industrial Logistics Center Buildings as a whole. An EIR must be prepared which accurately represents the whole of the action without piecemealing the project into separate, smaller development projects to present unduly low environmental impacts. 9-B

A project EIR must be prepared that accurately represents the whole of the action without piecemealing the project into separate, smaller development projects to present unduly low environmental impacts. CEQA Section 15161 describes project EIRs as examining "the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation." The specific development project is the construction and operation of all buildings proposed by Seefried Industrial/Ware Malcomb and those proposed on the overall 642.68 acre parcel.

Additionally, CEQA Section 15146 requires that the degree of specificity in an EIR "will correspond to the degree of specificity involved in the underlying activity which is described in the EIR. (a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy." Because there are multiple proposed buildings as part of a single project, the project EIR must be more detailed in the specific effects of the project. A project EIR must be prepared which accurately represents the whole of the action without piecemealing the project into separate, smaller development projects or development areas to present unduly low environmental impacts.

[1] https://psbweb.kerncounty.com/planning/pdfs/notices/Ware_Malcomb_Industrial_Project_NOP.pdf

3.0 Project Description

The EIR does not include a floor plan or detailed grading plan for the proposed warehouse. The basic components of a Planning Application include a detailed site plan, floor plan, grading plan, elevations, and written narrative. There is no plan that depicts the earthwork quantity notes. Providing this information is vital as the Project Description states that the project site is **"***relatively* **flat"** and there is no information provided regarding the import and/or export of soils/materials. Grading haul truck trips have the potential to add significant quantities of truck trips during project construction and therefore increase emissions. The EIR must be revised to include all application items for review, analysis, and comment by the public and decision makers.

Further, the EIR does not disclose or list the future tenant of the building. CEQA Guidelines Section 15146 requires that, **"The** degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR. (a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater **accuracy."** Since the proposed project is a specific construction project, the tenant for project operations must be disclosed and considered as part of the EIR analysis. Figure 3-3g: Proposed Precise Development Plan - Building Elevations indicates that the accent band on the top of the building is Pantone Blue 2995c, also known as "Amazon Prime Blue[2]**."** It is clear that the future tenant of the building is Amazon and this must be disclosed and considered in the EIR and its analysis. 9-C

Further, Table 3-5: Cumulative Projects List does not provide meaningful information to the public and decision makers. For example, there is no address provided for 9 of the 14 listed projects and the project size in acres is excluded for 8 of the projects. Entitlement numbers/case numbers are excluded for 5 of the projects, including Project 14 which appears to encompass the project site. The EIR must be revised to comprehensively include all pertinent information for all of the listed projects, including site address and entitlement numbers in order to provide an adequate informational document.

Additionally, the EIR does not provide any detailed information or meaningful analysis of the following required application items:

1. Zone Variance to authorize a 9.63-acre (gross) parcel where 20 acres (gross) is required (Section 19.12.050) in the A (Exclusive Agriculture) District (ZV No. 67, Map 142).

[2] https://www.alucobondusa.com/finish/amazon-prime-blue/

2. Tentative Parcel Map No. 12537 proposing the division of a 642.68-acre parcel into a 9.63-acre (gross) parcel, a 97.70-acre (gross) parcel and a 535.35-acre (gross) Designated Remainder which may be processed concurrently with, or subsequent to, other project entitlements.
3. An Agricultural Exclusion of 93.74 acres within the boundaries of Agricultural Preserve No. 10, Zone Map No. 142.

For example, the Tentative Parcel Map is not included as an exhibit for review by the public and decision makers. This is likely due to the project piecemealing described above as the TPM would provide meaningful information regarding future divisions of the parcel, specifically the **"Designated** Remainder which may be processed concurrently with, or subsequent to, other project **entitlements."** Additionally, there is no analysis of the **project's** compliance with the required findings for approval of a Zone Variance or the reasoning behind the request for the application. The EIR must be revised to include meaningful information and analysis of the above listed application items in order to provide an adequate informational document. 9-C

4.3 Air Quality, 4.6 Energy, and 4.8 Greenhouse Gas Emissions

Please refer to attachments from SWAPE for a complete technical commentary and analysis.

The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. This is especially significant as the surrounding community is highly burdened by pollution. According to CalEnviroScreen 4.0[3], **CalEPA's** screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability. The proposed **project's** census tract (6029003204) is ranked in the 84th percentile for overall pollution burden, meaning the surrounding community bears the impact of multiple sources of pollution and is more polluted than average on several pollution indicators measured by CalEnviroScreen. For example, the project census tract ranks in the 91st percentile for ozone burden and 94th percentile for particulate matter (PM) 2.5 burden. All of these environmental factors are typically attributed to heavy truck activity in the area. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure[4]. Fine particle pollution has been shown to cause many serious health effects, including heart and lung disease and exposure to PM 2.5 contributes to deaths across California[5]. 9-D

[3] CalEnviroScreen 4.0 https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40
[4] OEHHA Ozone Burden https://oehha.ca.gov/calenviroscreen/indicator/air-quality-ozone
[5] OEHHA Air Quality: PM 2.5 https://oehha.ca.gov/calenviroscreen/indicator/air-quality-pm25

The census tract ranks among the most severely impacted in several areas that impact water quality. The census tract ranks in the 98th percentile for groundwater threats. People who live near contaminated groundwater may be exposed to chemicals moving from the soil into the air inside their homes[6]. Accordingly, the census tract ranks in the 99th percentile for drinking water impacts, which indicates that it ranks with the worst quality drinking water in the state. Poor communities and people in rural areas are exposed to contaminants in their drinking water more often than people in other parts of the state[7].

The census tract also ranks in the 53rd percentile for solid waste facility impacts and 83rd percentile for hazardous waste facility impacts. Solid waste facilities can expose people to hazardous chemicals, release toxic gases into the air (even after these facilites are closed), and chemicals can leach into soil around the facility and pose a health risk to nearby populations[8]. Hazardous waste generators and facilities contribute to the contamination of air, water and soil near waste generators and facilities can harm the environment as well as people[9]. 9-D

Further, the census tract is a diverse community including 30% Hispanic, 3% African-American and 25% Asian-American residents, whom are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 38% of the census tract over age 25 has not attained a high school diploma, which is an indication that they may lack health insurance or access to medical care. The community also has a high rate of poverty, meaning 32% of the households in the census tract have a total income before taxes that is less than the poverty level. Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care[10]. Poor communities are often located in areas with high levels of pollution[11]. Poverty can cause stress that weakens the immune system and causes people to become ill from pollution[12]. Living in poverty is an indication that residents may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 68th percentile for incidence of cardiovascular disease.
The community also has a high rate of linguistic isolation, meaning 33% of the census tract speaks little to no English and faces further inequities as a result.

[6] OEHHA Groundwater Threats https://oehha.ca.gov/calenviroscreen/indicator/groundwater-threats
[7] OEHHA Drinking Water https://oehha.ca.gov/calenviroscreen/drinking-water
[8] OEHHA Solid Waste Facilities https://oehha.ca.gov/calenviroscreen/indicator/solid-waste-sites-and-facilities
[9] OEHHA Hazardous Waste Generators and Facilities https://oehha.ca.gov/calenviroscreen/indicator/hazardous-waste-generators-and-facilities
[10] OEHHA Poverty https://oehha.ca.gov/calenviroscreen/indicator/poverty
[11] Ibid.
[12] Ibid.

The State of California lists three approved compliance modeling softwares[13] for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The CalEEMod modeling does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project's significant Energy impacts and fuel consumption to the public and decision makers. Since the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, a finding of significance must be made. A revised EIR with modeling using one of the approved software types must be prepared and circulated for public review in order to adequately analyze the project's significant environmental impacts. This is vital as the EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not an approved software. 9-E

4.11 Land Use and Planning

Table 4.11-2: Consistency Analysis with Metropolitan Bakersfield General Plan for Land Use does not provide a consistency analysis with all land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The project has significant potential to conflict with many of these items, including but not limited to the following from the MBGP:

1. Land Use Element Policy 1: Provide for the following types of land uses, as depicted on the Land Use Plan (I-1).
2. Land Use Element Policy 91: Encourage employers and developers of employee-intensive commercial and industrial projects to provide facilities or referral services for the child care needs of employees (I-14).
3. Circulation Element Goal 3: Minimize the impact of truck traffic on circulation and on noise-sensitive land uses.
4. Circulation Element Goal 4: Provide a street system that creates a positive image of Bakersfield and contributes to residents' quality of life.
5. Circulation Element Goal 5: Provide a system of freeways which maintains adequate travel times in and around the metropolitan area.
6. Circulation Element Goal 6: Provide a local street network that contributes to the quality and safety of residential neighborhoods and commercial districts.
7. Circulation Element Goal 7: Develop and maintain a circulation system that supports the land use plan shown in the general plan.
8. Circulation Element Policy 16: Require that truck access to commercial and industrial properties be designed to minimize impacts on adjacent residential parcels (I-14).
9. Circulation Element Policy 34: Minimize the impacts of land use development on the circulation system. Review all development plans, rezoning applications, and proposed

9-F

[13] California Energy Commission 2022 Energy Code Compliance Software https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-1

general plan amendments with respect to their impact on the transportation system, and require revisions as necessary (I-26).

10. Conservation Element Goal 2 (Soils and Agriculture): Promote soil conservation and minimize development of prime agricultural land as defined by the following criteria: capability Class I and/or II irrigated soils, 80-100 Storie Index rating, gross crop return of $200 or more per acre per year, annual carrying capacity of 1 animal unit per acre per year.
11. Conservation Element Policy 3 (Soils and Agriculture): Protect areas designated for agricultural use, which include Class I and II agricultural soils having surface delivery water systems, from the encroachment of residential and commercial subdivision development activities (I-2).
12. Conservation Element Policy 9 (Soils and Agriculture): Protect prime agricultural lands against unplanned urban development by adopting agricultural zoning, agricultural land use designations, and by encouraging use of the Williamson Act and the Farmland Security Zone Program and policies that provide tax and economic incentives to ensure the long-term retention of agricultural lands (I-5).
13. Conservation Element Policy 17 (Soils and Agriculture): Sensitive subdivision design of lands near or adjacent to agricultural areas shall be conducted with consideration given to the impacts of nonagricultural uses on agricultural uses.
14. Conservation Element Policy 18 (Soils and Agriculture): To reduce the potential for conflicts between agricultural and nonagricultural uses, sensitive subdivision design of lands near or adjacent to agricultural areas shall be conducted including provisions for buffer zones (i.e., a road, canal, wall, easement, or setback).

9-F

Additionally, Table 4.11-2 includes misleading consistency analysis with MBGP goals and policies adopted with the purpose of avoiding or mitigating an environmental effect, including the following:

1. Land Use Element Goal 7: Establish a built environment which achieves a compatible functional and visual relationship among individual buildings and sites.

The EIR concludes the project is consistent with this policy because the **"Aesthetic** impacts are evaluated in Section 4.1, Aesthetics, of this Draft **EIR,"** and **"the** proposed project would be required to comply with the Dark Skies Ordinance and submit and outdoor lighting plan so as to reduce impacts to glare and lighting to the maximum extent **possible."** However, the project results in significant and unavoidable Aesthetics impacts that will not achieve a compatible functional and visual relationship among individual buildings and sites. This information is not included for analysis or discussion in the GP consistency analysis. The EIR must be revised to include a finding of significance as the project is directly inconsistent with it.

9-G

2. Land Use Element Goal 8: Target growth companies that meet clean air requirements, and create sustainable employment in jobs paying higher wages.

The EIR concludes the project is consistent with this policy because the "Impacts to air quality are analyzed in Section 4.3, Air Quality, in this Draft EIR," and "Impacts related to employment are evaluated in Section 4.14, Population and Housing." However, the project results in significant and unavoidable cumulatively considerable Air Quality impacts. The EIR has not provided any information regarding the employee wages during project construction or operation. The EIR has not providing any meaningful analysis or supporting evidence to support a consistency conclusion and must be revised to include a finding of significance as the project is directly inconsistent with it.

3. Land Use Element Policy 80: Assure that General Plan Amendment proposals for the conversion of designated agricultural lands to urban development occur in an orderly and logical manner giving full consideration to the effect on existing agricultural areas (see Chapter V, Conservation/Soils and Agriculture Policies 3 and 14) (I-15)

The EIR concludes the project is consistent with this policy because "the proposed project would be required to comply with all County zoning and land use requirements through site plan review and included forms, as well as submission of a summary report describing how the project would reduce conflicts to the extent feasible between the project's operation and the continued use of adjacent properties zoned A (Exclusive Agriculture)." Delaying analysis of how the project would reduce conflicts to the extent feasible between the project's operation and the continued use of adjacent properties zoned A to an unspecified date following CEQA review does not comply with CEQA's requirements for meaningful disclosure and adequate informational documents (CEQA § 15121 and 21003(b)). Delaying this analysis to after the CEQA process is deferred mitigation in violation of CEQA and a revised EIR must be prepared to include a finding of significance as the project is directly inconsistent with it..

9-G

4. Circulation Element Policy 20: Prohibit parking on new arterials in incorporated areas. In unincorporated areas, prohibit parking when traffic studies warrant elimination. Allow parking on collectors and on residential streets (I-17).

The EIR concludes the project is consistent with this policy because "the proposed project would include approximately 1,000 automobile, 702 Truck Trailer and 135 Dock Trailers parking spaced on-site. Additionally, the proposed project would include 200 EV Charging Stations and 22 ADA Accessible parking spots." However, there is no information provided regarding the elimination of street parking and/or the available horizontal sight distance for vehicles accessing the project site at each driveway. The EIR has not provided meaningful evidence to support a consistency conclusion and must be revised to include a finding of significance.

5. Conservation Element Policy 2 (Soils and Agriculture): Review projects that propose subdividing or urbanizing prime agricultural land to ascertain how continued commercial agricultural production in the project vicinity will be affected (I-2).

The EIR concludes the project is consistent with this policy because "**Agricultural** resource impacts are evaluated in Section 4.2, Agricultural and Forestry Resources, of this Draft EIR. Consistent with this measure, impacts to agricultural resources are evaluated in accordance with CEQA. This Draft EIR serves to comply with this **policy.**" However, this analysis excludes that the EIR concludes the project will have significant and unavoidable impacts to Agricultural Resources. The EIR has not provided meaningful evidence to support a consistency conclusion with this policy and must be revised to include a finding of significance as the project is directly inconsistent with it.

6. Conservation Element Goal 1 (Air Quality). Promote air quality that is compatible with health, well being, and enjoyment of life by controlling point sources and minimizing vehicular trips to reduce air pollutants.

The EIR concludes the project is consistent with this policy because "**Impacts** to vehicular emissions are analyzed in Section 17, Transportation, in this Draft EIR. See Policy 39, Circulation Element, **above.**" However, this analysis excludes that the EIR concludes the project will have significant and unavoidable impacts to Air Quality and Transportation (VMT). The EIR has not provided meaningful evidence to support a consistency conclusion with this policy and must be revised to include a finding of significance as the project is directly inconsistent with it. 9-G

7. Conservation Element Policy 2 (Air Quality). Encourage land uses and land use practices which do not contribute significantly to air quality degradation.
8. Conservation Element Goal 3 (Air Quality). Reduce the amount of vehicular emissions in the planning area.
9. Conservation Element Policy 4 (Air Quality). Consider air pollution impacts when evaluating discretionary land use proposals. Considerations should include: a) Alternative access routes to reduce traffic congestion; b) Development phasing to match road capacities; c) Buffers including increase vegetation to increase emission dispersion and reduce impacts of gaseous or particulate matter on sensitive uses.

The EIR concludes the project is consistent with these policies because "**Impacts** to air quality are evaluated in Section 4.3, Air Quality, in this Draft EIR. Consistent with this measure, impacts to agricultural resources are evaluated in accordance with CEQA. This Draft EIR serves to comply with this **policy.**" However, this analysis excludes that the EIR concludes the project will have significant and unavoidable impacts to Air Quality. The EIR has not provided meaningful

evidence to support a consistency conclusion with these policies and must be revised to include a finding of significance as the project is directly inconsistent with them. 9-G

Further, it must be noted that the horizon year of the Metropolitan Bakersfield General Plan (MBGP) is 2020. Any development beyond year 2020 is not accounted for or analyzed by the MBGP and its EIR. The project is proposed four years after the horizon year of the MBGP and therefore is not accounted for in its growth projections or environmental analysis. Table 3-1: General Plan Land Use Designations within the MBGP EIR[14] lists that Industrial designated lands totaled 16,429 acres. The **project's** proposed GPA No. 21 is an addition of 93.74 acres beyond the total in the MBGP EIR, and it was not accounted for in the growth projection to begin with. The EIR is inadequate as an informational document since the horizon year of the MBGP has passed and it has not provided a cumulative analysis of all light industrial projects approved since adoption of MBGP to accurately quantify the existing buildout scenario of the MBGP and/or the Kern County General Plan. A revised EIR must be prepared to include this information for analysis to adequately and accurately analyze all potentially significant environmental impacts. A finding of significance must be included because the project is not accounted for in the MBGP and/or Kern County General Plan growth projections and is beyond the 2020 horizon year analyzed in the MBGP Plan EIR[15]. 9-H

The project proposes General Plan Amendment No. 21 to change the Land Use Element of the Metropolitan Bakersfield General Plan from Map Code RIA (Intensive Agriculture – minimum 20-acre parcel size) to LI (Light Industrial) for approximately 93.74 acres. Notably, the description of the Light Industrial land use designation states it permits, "Unobtrusive industrial activities that can locate in close proximity to residential and commercial uses with a minimum of environmental conflicts are included in this **category."** The project will result in significant and unavoidable cumulatively considerable impacts to to Aesthetics, Agricultural Resources, Air Quality, Greenhouse Gases, Water Supply (Hydrology), Transportation and Traffic, and Utilities (Water Supply), indicating that it is an obtrusive industrial activity with multiple environmental conflicts. The project does not comply with the intent and permitted activities of the proposed land use designation, meaning that the GPA must be disapproved and the EIR must provide a finding of significance. 9-I

Additionally, the EIR does not provide a consistency analysis with Kern **COG'S** 2022 Regional Transportation Plan (RTP)[16]. Due to errors in modeling and modeling without supporting evidence, as noted throughout this comment letter, and the **EIR's** determination that the project 9-J

[14] MBGP EIR https://psbweb.kerncounty.com/planning/pdfs/mbgp/MBGP_FPEIR.pdf
[15] Cerritos General Plan and EIR http://www.cerritos.us/GOVERNMENT/city_regulations/cerritos_general_plan.php
[16] Kern COG 2022 RTP https://www.kerncog.org/category/docs/rtp/

will have significant and unavoidable impacts to Air Quality, Greenhouse Gas Emissions, and Transportation, the proposed project is directly inconsistent with Goal 1 to improve the mobility of people and freight, Goal 3 to improve the reliability and safety of the transportation system, and Goal 5 to promote livable communities and satisfaction of consumers with the transportation system. The EIR must be revised to include finding of significance due to inconsistency with the 2022 RTP document. 9-J

4.14 Population and Housing

The EIR utilizes uncertain and misleading language in stating that, **"it** is *anticipated* that the construction workforce would commute to the project site from *local communities,"* which does not provide any meaningful analysis of the project's population and employment (construction or operational employees) generation. The EIR relies upon the **County's** overall unemployment rates to fill the **project's** jobs without providing information on whether the unemployed workforce is interested in or qualified for work in the construction and/or industrial sectors to reach the conclusion that, **"temporary** and permanent employees required by the proposed project could come from the surrounding areas within the Bakersfield MSA without the need for relocation**."** Notably, the geographic boundaries of **"local communities"** and **"Bakersfield MSA"** are not defined, and relying on the entire labor force within all of Kern County to fill the **project's** construction and operational jobs will increase VMT and emissions during all phases of construction and operations and a revised EIR must be prepared to account for longer worker trip distances. In order to comply with CEQA's requirements for meaningful disclosure and adequate informational documents, a revised EIR must be prepared to provide demographic and geographic information on the location of qualified workers to fill these positions. 9-K

Additionally, the EIR states that the **"number** of on-site construction workers needed would largely depend on the specific phase of construction but would likely range between a few dozen workers up to 100 at any given **time,"** and that for project operations, **"the** facility would employ approximately 915 employees per shift (1,830 total) in peak season and 732 employees per shift (1,464 total) in non-peak **season,"** without providing a source of the methodology for these calculations. The EIR must be revised to include the background data and methodology for determining the quantity of construction and operational jobs. 9-L

Further, the cumulative analysis also utilizes uncertain and misleading language in stating that, **"a** number of warehouse projects are proposed in the project vicinity. All of these projects may have the potential to induce population growth, however, they would be able to be staffed by the existing regional workforce within Kern **County."** There is no quantification of the employees required by the cumulative projects to accurately demonstrate the available workforce can absorb these 9-M

employees without inducing growth. The EIR continues to state that, **"Cumulative** projects would be required to address potential environmental impacts as part of their individual project **review."** This is an erroneous and misleading statement given the ability of any project to generate significant and unavoidable impacts (such as the proposed **project's** significant and unavoidable cumulatively considerable impacts to Aesthetics, Agricultural Resources, Air Quality, Greenhouse Gases, Water Supply (Hydrology), Transportation and Traffic, and Utilities (Water Supply)) and the lead **agency's** ability to adopt a statement of overriding considerations, meaning that other projects may also contribute cumulatively to negative environmental impacts in the area. The EIR must be revised to provide an adequate cumulative analysis, including the workforce needs of each project, environmental status of each cumulative project, identify significant impacts of all projects, and analyze them cumulatively in consideration of the proposed project. 9-M

The EIR also states that, **"cumulative** projects would be consistent with planned growth within the **County."** This is certainly incorrect as Table 3-5: Cumulative Projects List states that projects 4, 8, 13, and 14 all require a GPA, ZC, or both changes to proceed, indicating that these projects are not consistent with planned growth within the County. The EIR also states that, **"given** a conservative analysis and assuming that all employees relocate to the area, the proposed project would account for a very small percentage of the projected population increase predicted by Kern **COG."**

Kern COG adopted 2035 growth projections as part of the 2022 RTP, which are used by the EIR for analysis. Kern **COG's** Growth Forecast[17] notes that Metro Bakersfield will add 18,065 jobs between 2020 - 2035. Utilizing the **EIR's** calculation of 1,830 employees, the project represents 10.1% of the Metro **Bakersfield's** employment growth from 2020 - 2035. A single project accounting for 10.1% of the projected employment growth within Metro Bakersfield over 15 years represents a significant amount of growth. The EIR must be revised to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2020 and projects **"in** the **pipeline"** to determine if the project will exceed the employment and/or population growth forecast and present an accurate and adequate analysis of the proposed **project's** impacts to population and housing. For example, another recent industrial project known as Majestic Gateway Bakersfield[18] also required a GPA to the MBGP from General Commercial (GC) to Light Industrial (LI) and was anticipated to generate 1,512 employees. When considered with the proposed project, the two projects will cumulatively generate 3,342 employees, which is 18.5% of Metro Bakersf**ield's** employment growth forecast over 15 years accounted by only two recent industrial projects that both require changes in land use designations to proceed. This total increases exponentially when 9-N

[17] Kern COG 2022 RTP Planning Assumptions https://www.kerncog.org/wp-content/uploads/2022/04/CHAPTER-3-PLANNING-ASSUMPTIONS-2022-RTP-1.pdf
[18] Majestic Gateway Bakersfield https://ceqanet.opr.ca.gov/2022030196/2

other industrial and commercial development activity is added to the calculation. A revised EIR must be prepared to include this information for analysis, and also provide a cumulative analysis discussion of projects approved since RTP adoption and projects **"in** the **pipeline"** to determine if the proposed project will exceed the employment/population growth forecasts by Kern COG, Kern County General Plan and/or the MBGP. 9-N

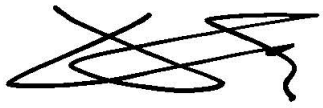
6.0 Alternatives

The EIR is required to evaluate a reasonable range of alternatives to the proposed project which will avoid or substantially lessen any of the significant effects of the project (CEQA § 15126.6). The alternatives chosen for analysis include the CEQA required **"No Project"** alternative and only two others - Reduced Footprint Alternative and Alternate Site Alternative. The EIR does not evaluate a reasonable range of alternatives as only two alternatives beyond the required No Project alternative are analyzed. The EIR does not include an alternative that meets the project objectives and also eliminates all of the **project's** significant and unavoidable impacts. The EIR must be revised to include analysis of a reasonable range of alternatives and foster informed decision making (CEQA § 15126.6). This must include alternatives such as development of the site with a project that reduces all of the proposed **project's** significant and unavoidable impacts to less than significant levels. 9-O

Conclusion

For the foregoing reasons, GSEJA believes the EIR is flawed and a revised EIR must be prepared for the proposed project and recirculated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. 9-P

Sincerely,



Gary Ho
Blum, Collins & Ho LLP

Attachment: SWAPE Analysis

Attachment: Soil Water Air Protection Enterprise (SWAPE) Comments

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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March 29, 2024

Gary Ho
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Subject: Comments on the Westside Industrial Project (SCH No. 2023100467)

Dear Mr. Ho,

We have reviewed the February 2024 Draft Environmental Impact Report ("DEIR") for the Westside Industrial Project by Seefried Industrial Properties ("Project") located in the City of Bakersfield ("City"). The Project proposes to construct 653,442-square-feet ("SF") of warehouse space and 1,702 parking spaces on the 93.74-acre site.

Our review concludes that the DEIR fails to adequately evaluate the Project's air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project may be underestimated and inadequately addressed. A revised Environmental Impact Report ("EIR") should be prepared to adequately assess and mitigate the potential air quality, health risk, and greenhouse gas impacts that the project may have on the environment. 9-AA

Air Quality

Failure to Provide Complete CalEEMod Output Files

Land use development projects under the California Environmental Quality Act ("CEQA") typically evaluate air quality impacts and calculate potential criteria air pollutant emissions using the California Emissions Estimator Model ("CalEEMod").[1] CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user 9-BB

[1] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide.

can change the default values and input project-specific values, but CEQA requires that such changes be justified by substantial evidence. Once all of the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters are used in calculating the Project's air pollutant emissions and demonstrate which default values are changed. Justifications are provided for the selected values.

According to the DEIR, CalEEMod Version 2022.1 is relied upon to estimate Project emissions (p. 4.3-28). However, this poses a problem as the version of CalEEMod 2022.1 currently available is described as a "soft release" which fails to provide complete output files.[2] Specifically, the "User Changes to Default Data" table no longer provides the quantitative counterparts to the changes to the default values (see excerpt below) (Appendix A, pp. 556):

8. User Changes to Default Data

Screen	Justification
Land Use	The land use summary is based on site plan and applicant-provided information. Total 93.74 acres. Does not include the Off-Site Improvements.
Construction: Construction Phases	No demolition is needed. CalEEMod Defaults. Construction includes off-site dedication area construction.
Construction: Trips and VMT	Paving Phase's Vendor Trips are calculated based on 12 inch (base + paving) of asphalt.
Construction: Architectural Coatings	Based on applicant-provided information
Construction: Paving	The paved area is based on land use summary.
Operations: Architectural Coatings	Interior Architectural Requirements adjusted for warehouse, accounting for interior walls for breakrooms, restrooms, mechanical rooms
Operations: Vehicle Data	Trip Rates based on Traffic Study ITE Trip Rates Land Use 155 (High Cube Fulfillment Warehouse) Trip Length for Passenger Trips - Default Trip Length for Trucks based based on Kern County Logisitics
Operations: Fleet Mix	Passenger Car amd Truck Fleet mix
Operations: Energy Use	All-Electric Buildings, Natural Gas = 0
Operations: Water and Waste Water	No water usage at pump/guard house
Operations: Solid Waste	No Waste generation at pump/guard house
Operations: Refrigerants	Refrigerant emissions not calculated.
Characteristics: Utility Information	2021 Power Content - PG&E Dase Plan

9-BB

However, previous CalEEMod Versions, such as 2020.4.0, include the specific numeric changes to the model's default values (see example excerpt below):

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	230.00	167.00
tblConstructionPhase	PhaseEndDate	11/22/2023	8/25/2023
tblConstructionPhase	PhaseEndDate	9/27/2023	6/30/2023
tblConstructionPhase	PhaseEndDate	10/25/2023	7/28/2023
tblConstructionPhase	PhaseStartDate	10/26/2023	7/29/2023
tblConstructionPhase	PhaseStartDate	9/28/2023	7/1/2023
tblLandUse	LandUseSquareFeet	160,000.00	160,371.00
tblLandUse	LandUseSquareFeet	119,000.00	41,155.00
tblLandUse	LotAcreage	3.67	3.68
tblLandUse	LotAcreage	2.73	2.74

[2] "CalEEMod California Emissions Estimator Model Soft Release." California Air Pollution Control Officers Association (CAPCOA), 2022, *available at:* https://caleemod.com/.

2

The output files associated with CalEEMod Version 2022.1 fail to present the exact parameters used to calculate Project emissions. To remedy this issue, the DEIR should have provided access to the model's ".JSON" output files, which allow third parties to review the model's revised input parameters.[3] Without access to the complete output files, including the specific numeric changes to the default values, we cannot verify that the DEIR's air modeling and subsequent analysis is an accurate reflection of the proposed Project. A revised EIR should be prepared to include an updated air quality analysis that correctly provides the complete output files for CalEEMod Version 2022.1, or includes an updated air model using an older release of CalEEMod.[4] 9-BB

Unsubstantiated Input Parameters Used to Estimate Project Emissions

As discussed, the DEIR relies on CalEEMod Version 2022.1 to estimate the Project's air quality emissions and fails to provide the complete output files required to adequately evaluate model's analysis (p. 20). Regardless, when reviewing the Project's CalEEMod output files, provided as Appendix A to the DEIR, we were able to identify several model inputs that are inconsistent with information disclosed in the DEIR. Consequently, the Project's construction and operational emissions may be underestimated. A revised EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality. 9-CC

Unsubstantiated Changes to Construction-related and Operational Architectural Coatings Values

Review of the CalEEMod output files demonstrates that the "Westside Industrial Project - Construction Custom Report" and "Westside Industrial Project - Operations 2026 Custom Report" models include changes to the default architectural coating emission factors (see excerpt below) (Appendix A, pp. 536, 556, 557). 9-DD

[3] "Video Tutorials for CalEEMod Version 2022.1." California Air Pollution Control Officers Association (CAPCOA), May 2022, *available at:* https://www.caleemod.com/tutorials.
[4] "CalEEMod Version 2020.4.0." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* http://www.aqmd.gov/caleemod/download-model.

8. User Changes to Default Data

Screen	Justification
Land Use	The land use summary is based on site plan and applicant-provided information. Total 93.74 acres. Does not include the Off-Site Improvements.
Construction: Construction Phases	No demolition is needed. CalEEMod Defaults. Construction includes off-site dedication area construction.
Construction: Trips and VMT	Paving Phase's Vendor Trips are calculated based on 12 inch (base + paving) of asphalt.
Construction: Architectural Coatings	Based on applicant-provided information
Construction: Paving	The paved area is based on land use summary.
Operations: Architectural Coatings	Interior Architectural Requirements adjusted for warehouse, accounting for interior walls for breakrooms, restrooms, mechanical rooms
Operations: Vehicle Data	Trip Rates based on Traffic Study ITE Trip Rates Land Use 155 (High Cube Fulfillment Warehouse) Trip Length for Passenger Trips - Default Trip Length for Trucks based based on Kern County Logisitics
Operations: Fleet Mix	Passenger Car amd Truck Fleet mix
Operations: Energy Use	All-Electric Buildings, Natural Gas = 0
Operations: Water and Waste Water	No water usage at pump/guard house
Operations: Solid Waste	No Waste generation at pump/guard house
Operations: Refrigerants	Refrigerant emissions not calculated.
Characteristics: Utility Information	2021 Power Content - PG&E Base Plan

As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.[5] As demonstrated above in the "User Changes to Default Data" table, the justification provided for the construction-related architectural coatings changes is: 9-DD

> "Interior Architectural Requirements adjusted for warehouse, accounting for interior walls for breakrooms, restrooms, mechanical rooms (Appendix A, pp. 556, 557).

Furthermore, the justification provided for the operational architectural coatings changes is:

> "Proposed warehouse construction exterior coating. Few interior walls, thus have an interior factor of 1.5 to exterior walls" (Appendix A, pp. 538).

However, the reductions to the construction-related and operational architectural coating emission factors remain unsubstantiated. As previously discussed, the output files for CalEEMod 2022.1 do not present the numeric changes to any model defaults. Upon further review of the output files, Table 5.5 contains the only mention of architectural coatings (see excerpt below) (Appendix A, pp. 536, 554):

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	490,702	327,135	135,123

However, as demonstrated above, Table 5.5 only provides the *square footage* of area to be coated. Since the output files fail to demonstrate the architectural coating *emission factors* that the model relies on, we cannot verify that the values included in the model are accurate.

[5] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 1, 14.

These unsubstantiated reductions present an issue, as CalEEMod uses the architectural and area coating emission factors to calculate the Project's volatile organic compound ("VOC") emissions.[6] By including unsubstantiated reductions to the default architectural and area coating emission factors, the model may underestimate the Project's construction-related VOC emissions and should not be relied upon to determine Project significance. 9-DD

Omission of Operational Vehicle Trip Values from CalEEMod Output Files

Review of the CalEEMod output files demonstrates that the "Westside Industrial Project - Operations 2026 Custom Report" model includes changes to the default vehicle trip values (see excerpt below) (Appendix A, pp. 556, 557):

8. User Changes to Default Data

Screen	Justification
Land Use	The land use summary is based on site plan and applicant-provided information. Total 93.74 acres. Does not include the Off-Site Improvements.
Construction: Construction Phases	No demolition is needed. CalEEMod Defaults. Construction includes off-site dedication area construction.
Construction: Trips and VMT	Paving Phase's Vendor Trips are calculated based on 12 inch (base + paving) of asphalt.
Construction: Architectural Coatings	Based on applicant-provided information
Construction: Paving	The paved area is based on land use summary.
Operations: Architectural Coatings	Interior Architectural Requirements adjusted for warehouse, accounting for interior walls for breakrooms, restrooms, mechanical rooms
Operations: Vehicle Data	Trip Rates based on Traffic Study ITE Trip Rates Land Use 155 (High Cube Fulfillment Warehouse) Trip Length for Passenger Trips - Default Trip Length for Trucks based based on Kern County Logisitics
Operations: Fleet Mix	Passenger Car amd Truck Fleet mix
Operations: Energy Use	All-Electric Buildings, Natural Gas = 0
Operations: Water and Waste Water	No water usage at pump/guard house
Operations: Solid Waste	No Waste generation at pump/guard house
Operations: Refrigerants	Refrigerant emissions not calculated.
Characteristics: Utility Information	2021 Power Content - PG&E Base Plan

9-EE

As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.[7] As demonstrated above in the "User Changes to Default Data" table, the justification provided for these changes is:

> "Trip Rates based on Traffic Study ITE Trip Rates Land Use 155 (High Cube Fulfillment Warehouse) Trip Length for Passenger Trips - Default Trip Length for Trucks based based on Kern County Logistics" (Appendix A, pp. 556, 557)

Furthermore, the DEIR provides the following table (see excerpt below) (p. 57, Table 9):

[6] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 35, 40.
[7] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 1, 14.

5

Table 9: Proposed Project Trip Generation

Land Use	ITE Code[1]	Size (1,000 square feet)	Daily Trips	
			Rate	Total
Total Passenger Cars	155	629.2	6.21	3,097
Heavy-Duty Trucks	155	629.2	0.23	145

Source:
[1] Institute of Transportation Engineers (ITE). 2021. Trip Generation Manual, 11th Edition.

9-EE

However, these changes remain unsubstantiated, as the CalEEMod output files fail to include the corresponding vehicle trip values whatsoever. While the DEIR includes the Project's trip generation values, the output files fail to demonstrate which values are inputted into into the model. Until the model discloses these values, we cannot verify these changes are accurate.

By including unsubstantiated changes to the Project's vehicle trip rates, the model may underestimate the Project's operational emissions and should not be relied upon to determine Project significance.

Unsubstantiated Changes to Operational Fleet Mix Values

Review of the CalEEMod output files demonstrates that the "Westside Industrial Project - Operations 2026 Custom Report" model includes changes to the default operational vehicle fleet mix percentages (see excerpt below) (Appendix A, pp. 556, 557).

Screen	Justification
Land Use	The land use summary is based on site plan and applicant-provided information. Total 93.74 acres. Does not include the Off-Site Improvements.
Construction: Construction Phases	No demolition is needed. CalEEMod Defaults. Construction includes off-site dedication area construction.
Construction: Trips and VMT	Paving Phase's Vendor Trips are calculated based on 12 inch (base + paving) of asphalt.
Construction: Architectural Coatings	Based on applicant-provided information
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Operations: Fleet Mix	Passenger Car amd Truck Fleet mix
Operations: Energy Use	All-Electric Buildings, Natural Gas = 0
Operations: Water and Waste Water	No water usage at pump/guard house
Operations: Solid Waste	No Waste generation at pump/guard house
Operations: Refrigerants	Refrigerant emissions not calculated.
Characteristics: Utility Information	2021 Power Content - PG&E Base Plan

9-FF

However, these changes remain unsubstantiated. As previously discussed, the output files for CalEEMod 2022.1 do not present the numeric changes to any model defaults. Upon further review of the output files, changes to fleet mix percentages are not mentioned outside of the "User Changes to Default Data" table. Until the DEIR verifies the breakdown of heavy-heavy duty ("HHD"), medium-heavy duty ("MHD"), light-heavy duty ("LHD1, LDH2"), trucks used by the Project, we cannot verify that the values included in the model are accurate.[8]

[8] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 38.

These unsubstantiated changes present an issue, as CalEEMod uses operational vehicle fleet mix percentages to calculate the Project's operational emissions associated with on-road vehicles.[9] By including several unsubstantiated changes to the default operational vehicle fleet mix percentages, the model may underestimate the Project's mobile-source operational emissions and should not be relied upon to determine Project significance. 9-FF

Diesel Particulate Matter Emissions Inadequately Evaluated

The DEIR concludes that the proposed Project would result in a less-than-significant health risk impact based on a quantified construction and mobile-source operational health risk analysis ("HRA"). Specifically, the DEIR estimates that the maximum incremental cancer risk posed to nearby, existing residential sensitive receptors associated with exposure to diesel particulate matter ("DPM") emissions during Project construction and operation would be 2.1 and 0.35 in one million, respectively, which would not exceed the San Joaquin Valley Air Pollution Control District significance threshold of 20 in one million (see excerpts below) (p. 75, Table 14; p. 76, Table 15).

Table 14: Estimated Health Risks and Hazards During Project Construction

Receptor	UTM Easting (m)	UTM Northing (m)	DPM Concentration (ug/m³)	Cancer Risk (risk per million)	Chronic Non-Cancer HI[1]
Point of Maximum Impact	314,994	3,900,713	0.0773	17.9	0.015
Maximum Impacted Residential Receptor	314352.3	3900458	0.009	2.1	0.002
General Shafter Elementary	315894	3,899,563	0.004	0.9	0.001
Off-site Worker	314,565	3,901,240	0.02	0.2	0.004

Notes:
µg/m³ = micrograms per cubic meter
HI = hazard index
m = meters

9-GG

[9] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 36.

Table 15: Estimated Health Risks and Hazards During Project Operation

Source	UTM Easting (m)	UTM Northing (m)	DPM Concentration (ug/m³)	Cancer Risk (risk per million)	Chronic Non-Cancer HI[1]
Point of Maximum Impact	316094	3901262	0.0008	0.59	<0.001
Maximum Impacted Residential Receptor (MIR)	316093	3901224	0.00047	0.35	<0.001
General Shafter Elementary	315894	3899563	0.00003	0.02	<0.001
Off-Site Worker Receptor	314565	3901240	0.00026	0.04	<0.001

Notes:
µg/m3 = micrograms per cubic meter
HI = hazard index
m = meters
MIR = Maximally Impacted Sensitive Receptor
[1] Chronic non-cancer HI was estimated by dividing the maximum annual DPM concentration (as PM_{10} exhaust) by the REL of 5 µg/m³.
[2] Risk is based on Infant Exposure starting in Third Trimester and over the construction period.
Source: Appendix B.
The MIR was determined to be a residence located approximately at 316093 m E 3901224 m N along Houghton Road.

9-GG

However, the DEIR's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, is incorrect for two reasons.

First, the DEIR's construction HRA is incorrect, as it relies upon emissions estimates from an unsubstantiated air model, as discussed above in section of this letter titled "Unsubstantiated Input Parameters Used to Estimate Project Emissions." As a result, the HRA may rely on an underestimated DPM concentration to calculate the health risk associated with Project construction. The DEIR's construction HRA and the resulting cancer risk should not be relied upon to determine Project significance.

Second, the DEIR fails to mention the exposure assumptions for the construction-related and operational HRAs, such as age sensitivity factors ("ASF") or fraction of time at home ("FAH") values whatsoever. Until the DEIR substantiates the use of correct exposure assumptions, the HRAs may underestimate the cancer risk posed to nearby, existing sensitive receptors due to Project construction and operation. Furthermore, according to the *Risk Assessment Guidelines* provided by the Office of

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Environmental Health Hazard Assessment ("OEHHA"), the organization responsible for providing guidance on conducting HRAs in California, the DEIR's HRA should have used the following equation:[10]

A. Equation 8.2.4 A: $RISK_{inh\text{-}res} = DOSE_{air} \times CPF \times ASF \times ED/AT \times FAH$

7. $RISK_{inh\text{-}res}$ = Residential inhalation cancer risk
8. $DOSE_{air}$ = Daily inhalation dose (mg/kg-day)
9. CPF = Inhalation cancer potency factor (mg/kg-day^{-1})
10. ASF = Age sensitivity factor for a specified age group (unitless)
11. ED = Exposure duration (in years) for a specified age group
12. AT = Averaging time for lifetime cancer risk (years)
13. FAH = Fraction of time spent at home (unitless)

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However, the DEIR fails to mention or provide a dose and risk equation to calculate the Project's construction and operational cancer risks. As such, we cannot verify that the DEIR's HRA is accurate, and the Project's cancer risks may be underestimated.

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

The DEIR estimates that the Project would result in net annual greenhouse gas ("GHG") emissions of 14,232-metric tons of carbon dioxide equivalents per year ("MT CO_2e/year") (see excerpt below) (p. 4.8-22, Table 4.8-4).

9-HH

[10] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 8-7, Equation 8.2.4.

TABLE 4.8-4: UNMITIGATED PROJECT OPERATIONAL GREENHOUSE GASES 2026

Source	Emissions (MT CO_2e per year) 2026	Percent of Total
Area (Landscaping)	10	< 0.5%
Energy–Electrical	400	3%
Mobile–Trucks	6,995	49%
Mobile–Cars[1]	6,335	45%
Solid Waste	185	1%
Water/Wastewater	227	1%
Stationary	–	–
Amortized Construction Emissions	78	1%
Total Emissions	**14,232**	**100**

Notes:
MT CO_2e = metric tons of carbon dioxide equivalent
[1] Modeling for transportation and VMT for calculation of CO_2e were based on the proposed project's unmitigated emissions using CalEEMod defaults.
Source: FirstCarbon Solutions (FCS) 2023.

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The DEIR concludes that the Project would result in a significant-and-unavoidable GHG impact, stating:

> "Despite implementation of Mitigation Measures MM 4.17-2, MM 4.8-1, and MM 4.8-2, impacts would be significant and unavoidable" (p. 4.8-32).

The DEIR concludes that the Project would result in a significant-and-unavoidable GHG impact due to its implementation of all feasible mitigation measures. However, while we agree that the Project would result in a significant GHG impact, the DEIR's assertion that the Project incorporates *all* feasible mitigation measures is incorrect. According to CEQA guidelines, an impact can only be labeled as significant and unavoidable after all available, feasible mitigation is considered. Here, the DEIR fails to substantiate their claim that they implemented all feasible and available mitigation measures.

To reduce the Project's GHG impacts to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those suggested in the section of this letter titled "Feasible Mitigation Measures Available to Reduce Emissions." The Project should not be approved until a revised EIR is prepared, incorporating all feasible mitigation to reduce emissions to the maximum extent possible.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

Our analysis demonstrates that the Project would result in potentially significant air quality, health risk, and GHG impacts that should be mitigated further. In an effort to reduce emissions, the Project should

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consider the implementation of the following mitigation measures found in the California Department of Justice Warehouse Project Best Practices document.[11]

- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.
- Requiring all heavy-duty vehicles engaged in drayage to or from the project site to be zero-emission beginning in 2030.
- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.

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[11] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, *available at*: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf, p. 8 – 10.

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- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking. 9-11
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently reduce emissions released during Project construction and operation.

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A revised EIR should be prepared to include all feasible mitigation measures, as well as include updated air quality, health risk, and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent feasible. The revised EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's potentially significant emissions are reduced to the maximum extent possible. 9-JJ

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties. 9-KK

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

Attachment A: Matt Hagemann CV
Attachment B: Paul Rosenfeld CV

Attachment A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
Industrial Stormwater Compliance
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2104, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

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Attachment B

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
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Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Rosenfeld P. E., Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution.* **233,** 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P.,** (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry,* Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

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*, 70, 002252-002255.

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*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research.* 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004.* New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research.* 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research.* 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution.* Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 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*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference.* Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust.* Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives.* Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association.* Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum.* Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable.* Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association.* Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association.* Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference*. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association.* Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America.* Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America.* Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division
Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation
Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, Plaintiff, vs. Aruba et al, Defendant.
Case No. cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.
Civil Action No. 2:09-cv-232-WHA-TFM
Rosenfeld Deposition July 2010, June 2011

In the Circuit Court of Jefferson County Alabama
Jaeanette Moss Anthony, et al., Plaintiffs, vs. Drummond Company Inc., et al., Defendants
Civil Action No. CV 2008-2076
Rosenfeld Deposition September 2010

In the United States District Court, Western District Lafayette Division
Ackle et al., Plaintiffs, vs. Citgo Petroleum Corporation, et al., Defendants.
Case No. 2:07CV1052
Rosenfeld Deposition July 2009

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Response to Comment Letter 9: Golden State Environmental Justice Alliance (GSEJA)

9-A: Thank you for your comment and participation in the public review of this environmental document. This comment has been noted for the record and has been provided to the Kern County Planning Commission and The Kern County Board of Supervisors for consideration.

9-B: This comment states that the EIR does not describe the project, and purports that the proposed project is a piecemealed portion of a larger overall project to be developed within a larger industrial center in the project vicinity. This comment notes that Table 3-5, Cumulative Projects, indicates that a similar project application has been submitted on the overall parcel encompassing the project site and that development for the 642.68-acre parcel has been established and split into several smaller development projects in order to artificially reduce environmental impacts.

The comment appears to reference in Table 3-5 the project shown as Ware Malcomb 2909 Houghton Road Bakersfield, CA GPA, ZCC, PD GPA ZCC PD for Warehousing. 184-391-084 629.08. The comment does not provide substantial evidence regarding any significant impact.

This reference is inaccurate and in error as this notation refers to this same Draft EIR for Westside Industrial Project. The applicant submitted a site plan and project description for the project which, while on the same footprint of a portion of the 642.68 legal lot (184-391-084), is different in operation from the project described and analyzed in this Draft EIR. At that time a Notice of Preparation was circulated January 11, 2022 to February 9, 2022 with a scoping meeting on February 4, 2022. As detailed in Chapter 2- Introduction Section 2.4, a subsequent Notice of Preparation with the changed project description used in this Draft EIR was circulated, comments received and a scoping meeting conducted. All comments on this Draft EIR received from the Notice of Preparation circulated for this Draft EIR are included in Appendix A.

As the county will not accept and process two different proposals for the same footprint on a piece of property, the previous proposed use and site plan is void, was withdrawn by applicant by submitting a revised project description and was not analyzed in this Draft EIR. As there is no other project being processed by the applicant on any other portion of the 642.68 legal parcel there is no “piece-mealing” occurring under CEQA Chapter 3 – Project Description Section 3.9 Table 3-5 is corrected as follows:

Project Name/ CASE ID	Project Location	Case Type	Request	Project Site APN	Acreage
			KERN COUNTY PROJECTS		
One Mile Project List					
1.	West side of Costajo Road between Shafter Road and Bear Mountain Boulevard	Precise Development Plan	Precise Development Plan, Map 143, (APN 185-321-20) to allow an industrial development.	185-321-20	
2.		Temporary CUP	Temporary CUP for an agricultural trucking facility.	184-150-423	20.02
3.			EIR: Commercial;– Development of an industrial park-warehouse, distribution and retail showrooms.	185-140-084	306.92
4.	14201 Costajo Street Bakersfield, CA		General Plan Amendment and zone change to allow a tire shop. The application did not contain what the proposed land use designation or zoning district.	185-382-421	2.43
5.	13338 South H Street Bakersfield, CA	CUP	CUP, Map 143-18 for Ag truck parking.	185-381-399	2.01
6.		CUP	Map 142, CUP 65, Modification–Ag Trucking Facility.	184-230-01	
7.		CUP	Map 142, CUP 65, Mod–Ag Trucking Facility.	184-230-01	
8.		GPA, ZCC	Map 143-19, GPA and ZCC–Commercial Development.	185-321-28	
9.	15451 Costajo Road Bakersfield, CA	PD	Map 143-19, PD–Truck Parking Garage.	185-321-19	

Project Name/ CASE ID	Project Location	Case Type	Request	Project Site APN	Acreage
10.		CUP	CUP to allow an event venue facility to be used for weddings, baptisms, birthdays, and quinceneras on an A-1 zone and RR general plan land use code on 4.94 acres.	185-382-44	
11.		CUP	Map 143-18, CUP–Ag Trucking Facility.	185-210-03	
12.			To develop a trucking facility in an M-1 PD Zone District.	185-321-20	
13.		GPA, ZCC	Map 143-19, GPA, ZCC–Request GPA ZCC from RIA- to LI and A-1 to M-1 to allow for a tire distribution shop on 1.56 acres.	185-322-120	1.54
~~14.~~	~~2909 Houghton Road Bakersfield, CA~~	~~GPA, ZCC, PD~~	~~GPA ZCC PD for Warehousing.~~	~~184-391-084~~	~~629.08~~

Notes:
CUP = Conditional Use Permit
GPA = General Plan Amendment
LMR = Low Medium Density Residential
PD = Precise Development
ZCC = Zone Code Change

9-C: This comment states that the project description of the EIR does not include a floor plan or detailed grading plan for the proposed warehouse, stating that components of a Planning Application include a detailed site plan floor plan, grading plan, elevations, and a written narrative. The comment further states that there is no plan depicting earthwork quantity notes or information regarding import/export of soils/materials. The comment further states that grading haul truck trips have the potential to add significant quantities of truck trips during project construction and therefore increase emissions. The commenter states that the EIR must be revised to include all application items for review, analysis, and comment by the public and decision makers.

Staff notes that as demonstrated by *Citizens for a Sustainable Treasure Island v. City & County of San Francisco* (2014) 227 CA4th 1036, 1053, a CEQA document's description of the proposed project should identify the project's main features and other information needed for an analysis of the proposed project's environmental impacts. The project description "should not supply extensive detail beyond that needed for the evaluation and review of the environmental impact." (State CEQA Guidelines Section 15124). The proposed project is thoroughly described within the Draft IS/MND and supporting documents, which provide the level of detail needed for the evaluation of the proposed project by the public and decision-makers, and for the review of the proposed project's environmental impacts. As such, detailed plans such as grading plans, floor plans, or elevations are

not required to be included in the Draft EIR's project description and a general description of the proposed project and conceptual plans are allowed. A floor plan, conceptual grading plan, and building elevations are not required components of the CEQA document.

The comment does not provide substantial evidence regarding any significant environmental impact The commentor is incorrect that CEQA requires an internal floor plan. The proposed project is a land use entitlement for the underlying general plan and outside site layout including such details as parking and truck movements. The Kern County Zoning ordinance does not require environmental review of interior tenant improvements which are covered by the Kern County Building Code, Fire Code and other related construction codes. While mitigation on operations is appropriate the internal environment is not part of CEQA. The EIR project description provides sufficient information to adequately analyze the environmental impacts of the Project.

A complete grading plan is also not required. The extent and nature of the grading and any drainage and flood are sufficiently described in Chapter 3: Project Description, Chapter 4.7 Geology and Soils, Chapter 4.10 Hydrology and Water Quality, and referenced in all other chapters as appropriate. Mitigation has been imposed that requires actions before a grading or building permit is issued that ensures compliance to mitigation environmental impacts before any grading activities occur, consisting of the following: MM 4.1-3, MM 4.3 -2, MM 4.3-2, MM 4.3-5, MM 4.3-7, MM4.3-10, MM 4.4-2, MM 4.4-6, MM 4.5-1 MM 4.5-3, MM 4.6-1, MM 4.6-2, MM 4.7-2, MM 4.7-3, MM 4.7-5, MM 4.7-6, MM 4.7-9, MM 4.7-10, MM 4. 9-5, MM 4.9-7, MM 4.9-13, MM 4.9-14, MM 4.9-15, MM 4.10-1, MM 4-10.2, MM 4.13-2, MM 4.13-3, MM 4.15-1, MM 4. 19-5, MM 4.19-6, MM 4.19 -7.

The comment states that Table 3-5 does not provide meaningful information to the public and decision makers, as it contains missing information for some of the projects, including project 14 which appears to encompass the site. The comment states that the EIR must be revised to comprehensively include all pertinent information for all of the listed projects, including site address and entitlement numbers to provide an adequate informational document.

The cumulative impact list references applications that may or may not be complete. The information is sufficient and the error on the Table has been corrected in Response 9B.

The comment states that the EIR does not provide detailed information or meaningful analysis of the following required application items:

- Zone Variance to authorize a 9.63-acre (gross) parcel where 20 acres (gross) is required (Section 19.12.050) in the A (Exclusive Agriculture) District (ZV No. 67, Map 142).
- Tentative Parcel Map No. 12537 proposing the division of a 642.68-acre parcel into a 9.63-acre (gross) parcel, a 97.70-acre (gross) parcel and a 535.35-acre (gross) Designated Remainder which may be processed concurrently with, or subsequent to, other project entitlements.
- An Agricultural Exclusion of 93.74 acres within the boundaries of Agricultural Preserve No. 10, Zone Map No. 142.

The comment states that the Tentative Parcel Map is not included as an exhibit for review by the public and decision makers, purporting that this is due to project piecemealing, as it would provide meaningful information regarding future divisions of the parcel, specifically the "Designated Remainder which may be processed concurrently with, or subsequent to, other project

entitlements". The comment states there is no analysis of the project's compliance with the required findings for approval of a Zone Variance or the reasoning behind the request for the application. The comment states that the EIR must be revised to include meaningful information and analysis of the above listed application items to provide an adequate informational document.

The comment does not provide substantial evidence regarding any significant environmental impact. A project narrative has been included within the project description of the Draft EIR. Vesting Tentative Parcel Map 12537 being processed by the applicant includes a subdivision of a 646.64 acre (gross) site into two (2) parcels of the following lot sizes 97.70 acres (gross) and 548.94 acres (gross) identified as a "Designated Remainder". No development is proposed on any lot but Parcel 1 described in this Draft EIR. The zone variance has been withdrawn because it is not required.

9-D: The comment refers the reader to attachments from SWAPE for a complete technical commentary and analysis. Responses 9-AA – 9-KK have been provided in response to the comments made in the attachment.

The comment states that the EIR does not include analysis for relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. The commenter summarizes existing air quality conditions within the census tract where the project site is located using data obtained from the California Environmental Protection Agency (CalEnviroScreen 4.0), in addition to water quality and solid waste facility impacts. The comment further provides a breakdown of the diversity included in this census tract, and states that the community has a high rate of poverty. The comment does not provide substantial evidence regarding any significant environmental impact.

The comment is noted for the record and has been provided to the Kern County Planning Commission and the Kern County Board of Supervisors. Environmental justice, while an important consideration in land use, is not required to be discussed, analyzed or mitigated CEQA.

The comment does not provide substantial evidence regarding any significant environmental impact. As discussed in more detail in Section 4.3, Air Quality, of the Draft EIR, it utilized the currently recommended SJVAPCD significance thresholds to determine health risk impacts resulting from the proposed project in accordance with the mandates of CEQA. The Draft EIR acknowledged that the project site is adjacent to the existing sensitive receptors identified by the commenter, and therefore the Draft EIR identifies the potential health risk impacts that could occur as a result of project construction and operation and found that construction and operation health risk impacts would be below SJVAPCD thresholds. Therefore, the project's construction and operation would not have significant impacts on the sensitive receptors near the project area.

Further, as part of Mitigation Measure MM 4.3-5, the project applicant would pay fees to *fully* offset Project emissions of NO_X (oxides of nitrogen), ROG (reactive organic gases), PM_{10} (particulate matter of 10 microns or less in diameter), and $PM_{2.5}$ (particulate matter of 2.5 microns or less in diameter) (including as applicable mitigating for reactive organic gases by additive reductions of particulate matter of 10 microns or less in diameter) to avoid any net increase in these pollutants. The payment would fund SJVAPCD's emission reduction projects, which mitigate NOx,ROG, PM_{10} and $PM_{2.5}$ emission. Types of emission reduction projects that have been funded in the past include electrification of stationary internal combustion engines (such as agricultural irrigation pumps), replacing diesel school buses, and replacement of old farm tractors. A full

analysis of the SJVAPCD Emission reduction program is found in Appendix B-2– San Joaquin Valley Air Pollution Control District Supporting Documents.

9-E: This comment states that California lists three approved compliance modeling softwares for non-residential buildings, and purports that CalEEMod is not listed as an approved software, and its modeling does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project's significant energy impacts and fuel consumption. The comment further states that because the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, a finding of significance must be made. A revised EIR with modeling using one of the approved software types must be prepared and circulated for public review in order to adequately analyze the project's significant environmental impacts.

The comment does not provide substantial evidence regarding any significant environmental impact. Kern County utilized approved models from the San Joaquin Air Pollution Control District which is the authority for this air basin, the expert agency with respect to air emissions and which directed that CalEEMod be used. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform to calculate construction and operational emissions from land use development projects. CalEEMod was developed for the California Air Pollution Control Officers Association in collaboration with the California Air Districts. The model is a comprehensive tool for quantifying air quality impacts from land use projects located throughout California, is used throughout California, and can be used for a variety of situations where an air quality analysis is necessary, such as preparing CEQA or NEPA documents, conducting pre-project planning, and verifying compliance with local air quality rules and regulations. CalEEMod was updated in 2022 and includes the gas and electric utility emissions factors pursuant to the location of the Project, as well as building energy zones. The 2022 CalEEMod update generates default electricity and natural gas consumption that consider Title 24 standards.

CBECC software is approved specifically for Title 24 compliance; however, it is used to confirm that a final building design (with detailed information included in its construction drawings) is Title 24 compliant. The final designs and construction drawings are not available for the proposed project and are not typically prepared until after a proposed development project is approved/entitled. CBECC software is not used for disclosing air emissions, and there is no substantial evidence provided which states that this software should be used for discussing air emissions. *Maintain Our Desert Env't v Town of Apple Valley* (2004) 124 Cal.App.4th 430

The Draft EIR and underlying technical studies correctly use CalEEMod to estimate energy demand based on average intensity factors for similar land use types. Since the occupants of the proposed project's buildings are unknown at this time, and information about the future building users' energy use is also not available at this time, it is appropriate to rely upon the CalEEMod default assumptions which have been derived by the California Air Pollution Control Officers Association and accepted by the SJVAPCD. There is no requirement in CEQA to show specific compliance with 2022 Building Energy Efficiency Standards based on conceptual building designs that are proposed at the entitlement stage of a project's approval process. Compliance with building code requirements will be addressed pursuant to State law prior to issuance of each building permit and verified by the County's Building and Safety Department.

9-F: The comment states that Table 4.11-2, Consistency Analysis with Kern County Metropolitan Bakersfield General Plan (KCMBGP) does not provide consistency analysis with all land use plans,

policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The comment claims that the project has significant potential to conflict with many of these items, including but not limited to the following from the KCMBGP:

- Land Use Element Policy 1: Provide for the following types of land uses, as depicted on the Land Use Plan (I-1).
- Land Use Element Policy 91: Encourage employers and developers of employee-intensive commercial and industrial projects to provide facilities or referral services for the child care needs of employees (I-14).
- Circulation Element Goal 3: Minimize the impact of truck traffic on circulation and on noise-sensitive land uses.
- Circulation Element Goal 4: Provide a street system that creates a positive image of
- Bakersfield and contributes to residents' quality of life.
- Circulation Element Goal 5: Provide a system of freeways which maintains adequate travel times in and around the metropolitan area.
- Circulation Element Goal 6: Provide a local street network that contributes to the quality and safety of residential neighborhoods and commercial districts.
- Circulation Element Goal 7: Develop and maintain a circulation system that supports the land use plan shown in the general plan.
- Circulation Element Policy 16: Require that truck access to commercial and industrial properties be designed to minimize impacts on adjacent residential parcels (I-14).
- Circulation Element Policy 34: Minimize the impacts of land use development on the
- circulation system. Review all development plans, rezoning applications, and proposed general plan amendments with respect to their impact on the transportation system, and require revisions as necessary (I-26).
- Conservation Element Goal 2 (Soils and Agriculture): Promote soil conservation and minimize development of prime agricultural land as defined by the following criteria: capability Class I and/or II irrigated soils, 80-100 Storie Index rating, gross crop return of $200 or more per acre per year, annual carrying capacity of 1 animal unit per acre per year.
- Conservation Element Policy 3 (Soils and Agriculture): Protect areas designated for agricultural use, which include Class I and II agricultural soils having surface delivery water systems, from the encroachment of residential and commercial subdivision development activities (I-2).
- Conservation Element Policy 9 (Soils and Agriculture): Protect prime agricultural lands against unplanned urban development by adopting agricultural zoning, agricultural land use designations, and by encouraging use of the Williamson Act and the Farmland Security Zone
- Program and policies that provide tax and economic incentives to ensure the long-term retention of agricultural lands (I-5).
- Conservation Element Policy 17 (Soils and Agriculture): Sensitive subdivision design of lands near or adjacent to agricultural areas shall be conducted with consideration given to the impacts of nonagricultural uses on agricultural uses.
- Conservation Element Policy 18 (Soils and Agriculture): To reduce the potential for conflicts between agricultural and nonagricultural uses, sensitive subdivision design of lands near or adjacent to agricultural areas shall be conducted including provisions for buffer zones (i.e., a road, canal, wall, easement, or setback).

The comment does not provide substantial evidence regarding any significant environmental impact. A consistency analysis was completed for policies applicable to the proposed project. A project is not required to comply with all General Plan policies. CEQA does not contain any specific requirements for determining whether a project is inconsistent with an applicable plan. Courts will defer to a lead agency's decision on consistency with its own plan unless, on the basis of evidence before the decision-making body, a "reasonable person" could not have found the project to be consistent. See *The Highway 68 Coalition v County of Monterey* (2017) 14 CA5th 883, 896; *Clover Valley Found. v City of Rocklin* (2011) 197 CA4th 200, 239. Moreover, simply identifying a handful of policies that have not been specifically addressed in the EIR, but not explaining the alleged inconsistency as the comment does, is not sufficient to demonstrate that a reasonable person could not have found the project to be consistent. Also, CEQA is focused only on planning conflicts that lead to environmental impacts (*The Highway 68 Coalition v County of Monterey* (2017) 14 Cal.App,5th 883), and many of the cited policies do not involve environmental impacts. Under the Planning and Zoning Law, perfect consistency with all aspects of a general plan is not required. A lead agency may find a proposed project to be consistent with the local general plan if it furthers one or more policies and does not obstruct other policies. 67 Ops Cal Atty Gen 75 (1984); Office of Planning and Research (OPR), State of California General Plan Guidelines (2003). Generally, given that land use plans reflect a range of competing interests, a project should be compatible with the plan's overall goals and objectives but need not be in perfect conformity with every plan policy. See, e.g.,*Golden Door Props., LLC v County of San Diego* (2020) 50 CA5th 467, 502 (EIR finding that climate action plan would not be inconsistent with general plan was supported by substantial evidence); *Friends of Lagoon Valley v City of Vacaville* (2007) 154 CA4th 807, 815 (upholding overall consistency finding even though project deviated from some plan provisions because plan allowed for balancing of competing policies); *Sequoyah Hills Homeowners Ass'n v City of Oakland* (1993) 23 CA4th 704, 719 (although a project should be "in harmony" with a general plan's goals and objectives, it need not completely satisfy plan policies that allow for flexibility in interpretation and application). None of the policies or goals cited in the comment create mandatory provisions that apply to the project. Instead, generally, the cited policies and goals are satisfied because accommodates new development which channels land uses in a phased, orderly manner and is coordinated with the provision of infrastructure and public improvements. Therefore, the Draft EIR properly concludes that the proposed project is consistent with the General Plan.

9-G: The comment states that Table 4.11-2 includes misleading consistency analysis with KCMBGP goals and policies adopted with the purpose of avoiding or mitigating an environmental effect. Please refer to Response to Comment F for an explanation of CEQA requirements for making a finding of consistency and the deference afforded to lead agencies in evaluating their own general plan, including but not limited to the following:

- Land Use Element Goal 7: Establish a built environment which achieves a compatible functional and visual relationship among individual buildings and sites.

The comment states that because project impacts to aesthetics are significant and unavoidable, the proposed project will not achieve compatible functional and visual relationship among individual buildings and sites, claiming that the EIR must be revised to include a finding of significance as the project is directly inconsistent with it.

The comment does not provide substantial evidence regarding any significant environmental impact. Although the Draft EIR concluded that conversion of land in a presently rural area to industrial, uses cannot be mitigated to a degree that environmental impacts are no longer significant, that is a separate issue from the project's ability to achieve long range planning goals identified in the General Plan. Land Use Element Goal 7 establishes a goal for future development in the built environment separate from the County's threshold of significance for determining potential environmental impacts. The proposed project will further Goal 7 because it would introduce a cohesive design that would promote both a compatible and functional relationship amongst new development. As detailed in Section 4.1, Aesthetics, the proposed project would be developed in accordance with all applicable State and local design guidelines and regulations.

- Land Use Element Goal 8: Target growth companies that meet clean air requirements, and create sustainable employment in jobs paying higher wages.

The comment states that the proposed project would result in significant and unavoidable cumulatively considerable air quality impacts, and that the EIR has not provided any information regarding employee wages.

The comment does not provide substantial evidence regarding any significant environmental impact. The comment is correct and a full analysis of air quality and the significance finding can be found in Chapter 4.3 Air Quality.

The proposed project would not interfere with the County's goal to target growth companies that meet specific requirements and the comment fails to provide any evidence suggesting that the project would conflict with or impede this goal. Additionally, employee wages are an economic issue and not relevant to CEQA's evaluation of potential impacts to the physical environment. (*County of Butte v Department of Water Resources* (2023) 90 CA5th 147,) There is no Kern County policy that requires such information for a project application.

- Land Use Element Policy 80: Assure that General Plan Amendment proposals for the conversion of designated agricultural lands to urban development occur in an orderly and logical manner giving full consideration to the effect on existing agricultural areas (see Chapter V, Conservation/Soils and Agriculture Policies 3 and 14) (I-15)

The comment asserts that the EIR delays analysis of how the project would reduce conflicts to the extent feasible between project operation and the continued use of adjacent properties zoned for agricultural use to an unspecified date following CEQA review does not comply with CEQA's requirements for meaningful disclosure and adequate informational documents. The comment states that a revised EIR must be prepared to include a finding of significance as the project is directly inconsistent with it.

The comment fails to specify how the proposed project would impede or interfere with Policy 80 and provides no substantial evidence regarding any environmental impact.

- Circulation Element Policy 20: Prohibit parking on new arterials in incorporated areas. In unincorporated areas, prohibit parking when traffic studies warrant elimination. Allow parking on collectors and on residential streets (I-17).

The comment summarizes the EIR conclusion regarding parking, claiming that there is no information provided regarding the elimination of street parking and/or the available horizontal sight distance for vehicles accessing the project site at each driveway, claiming that the EIR has

not provided meaningful evidence to support a consistency conclusion and must be revised to include a finding of significance.

All parking for the proposed project would be contained in designated parking areas within the site. Sight Distance and parking are addressed in street improvement design prepared for the proposed project in coordination with the County. There are no horizonal curves approaching driveways and sight distance exceeds design requirements. In addition, parking has been restricted along the arterial roads in these plans.

- Conservation Element Policy 2 (Soils and Agriculture): Review projects that propose subdividing or urbanizing prime agricultural land to ascertain how continued commercial agricultural production in the project vicinity will be affected (I-2).

The comment states that the EIR's consistency conclusion for this policy excludes that the project would result in significant and unavoidable impacts to agricultural resources, claiming that the EIR has not provided meaningful evidence to support a consistency conclusion and must be revised to include a finding of significance as the project is directly inconsistent with it.

An analysis of the project and its effects to agricultural land on the site and in the surrounding area was completed in Section 4.2, Agriculture and Forestry Resources.

- Conservation Element Goal 1 (Air Quality). Promote air quality that is compatible with health, well being, and enjoyment of life by controlling point sources and minimizing vehicular trips to reduce air pollutants.

The comment summarizes the EIR's consistency conclusion and claims that the analysis excludes that the EIR concludes the project will have significant and unavoidable impacts to Air Quality and Transportation (VMT). The comment purports that the EIR has not provided meaningful evidence to support a consistency conclusion with this policy and must be revised to include a finding of significance as the project is directly inconsistent with it.

The comment does not provide substantial evidence regarding any significant environmental impact Consistency with Goal 1 can be established by demonstrating that proposed project reduces air pollutants; however, it does not require the complete elimination of pollutants. The proposed project includes several elements to promote air quality, control point sources and minimize air pollutants. For example, consistent with this goal, the proposed project would implement Mitigation Measures MM 4.3-1 through MM 4.3-10 to help reduce pollutant concentrations during construction. Accordingly, the County may determine that the proposed project is consistent with this goal.

- Conservation Element Policy 2 (Air Quality). Encourage land uses and land use practices which do not contribute significantly to air quality degradation.
- Conservation Element Goal 3 (Air Quality). Reduce the amount of vehicular emissions in the planning area.
- Conservation Element Policy 4 (Air Quality). Consider air pollution impacts when evaluating discretionary land use proposals. Considerations should include: a) Alternative access routes to reduce traffic congestion; b) Development phasing to match road capacities; c) Buffers including increase vegetation to increase emission dispersion and reduce impacts of gaseous or particulate matter on sensitive uses.

The comment summarizes the EIR's consistency conclusion and claims that the analysis excludes that the project will have significant and unavoidable impacts to air quality. The comment purports that the EIR has not provided meaningful evidence to support a consistency conclusion with these policies and must be revised to include a finding of significance as the project is directly inconsistent with them.

The comment does not provide substantial evidence regarding any significant environmental impact While cumulative air quality impacts would be significant and unavoidable, the proposed project demonstrates consistency with Policy 2 as all project-level impacts would be less than significant with the implementation of mitigation. With respect to Goal 3, emissions resulting from the proposed project would consist primarily of off-site mobile source emissions and indirect electricity emissions. Greenhouse gas emissions would continue to decline rapidly for future buildout years based on currently applicable regulations and mitigation measures adopted by the proposed project, as noted in Section 4.8, Greenhouse Gas Emissions, of the Draft EIR. With respect to Policy 4, air quality impacts were analyzed for the proposed project in Section 4.3, Air Quality, of the Draft EIR. As stated previously, project-level air quality impacts were found to be less than significant with the implementation of mitigation. The proposed project is strategically sited near State Route (SR) 99, allowing for easy access to nearby freeways. As noted in Section 4.17, Transportation and Traffic of the Draft EIR, impacts to local roadways would be less than significant with the implementation of Mitigation Measure MM 4.17-1, which requires improvements to Houghton Road and Union Avenue. Furthermore, the proposed project would implement a Transportation Demand Management (TDM) program and implement various TDM measures to reduce VMT impacts. Finally, the proposed project would include vegetative buffers as required by the County to reduce impacts to nearby sensitive uses.

9-H: The comment states that the horizon year of the KCMBGP is 2020. Any development beyond 2020 is not accounted for or analyzed by the KCMBGP and its EIR. The proposed project is four years after the horizon year and is therefore not accounted for in its growth projections or environmental analysis.

The comment states that Table 3-1, General Plan Land Use Designations within the MBGP EIR of the MGP EIR lists that industrial designated lands totaled 16,429 acres. The project's proposed GPA No. 21 is an addition of 93.74 acres beyond the total in the MBGP EIR, and was not accounted for in the growth projections to begin with.

The comment purports that the EIR is inadequate as an informational document since the horizon year of KCMBGP has passed and it has not provided a cumulative analysis of all light industrial projects approved since adoption of the KCMBGP to accurately quantify the existing buildout scenario of the KCMBGP and/or the Kern County General Plan. The comment states that a revised EIR must be prepared to include this information for analysis to analyze all potentially significant environmental impacts. A finding of significance must be included because the project is not accounted for in the KCMBGP and/or Kern County General Plan growth projections and is beyond the 2020 horizon year analyzed in the KCMBGP EIR.

The comment does not provide substantial evidence regarding any significant envirinmetal impact. The certified Final EIR is presumed legally adequate, as there were no legal challenges to its certification. The population and growth projections in the KC MBGP have not been exceeded or achieved due to the cyclical nature of land development and specific economic factors affecting

Kern County. Therefore, while the proposed project may be outside of the horizon year for growth projections, the proposed project's projections are considered to be within the projected growth anticipated by the KCMBGP. The KCMBGP

9-I: The comment states that the project applicant proposed GPA No. 21 to change the Land Use Element of the Kern County Metropolitan Bakersfield General Plan from Map Code RIA to LI for approximately 93.74 acres. The comment states that the description of the Light Industrial land use designation states that it permits "unobtrusive industrial activities that can locate in close proximity to residential and commercial uses with a minimum of environmental conflicts are included in this category". The comment states that the project will result in significant and unavoidable impacts to aesthetics, agricultural resources, air quality, greenhouse gases, water supply (hydrology), transportation and traffic, and utilities (water supply), purporting that this indicates that it is an obtrusive industrial activity with multiple environmental conflicts. The commenter purports that the project does not comply with the intent and permitted activities of the proposed land use designation, meaning that the GPA must be disapproved and the EIR must provide a finding of significance.

While the zoning ordinance uses the word " unobtrusive" that is a specific land use compatibility term, not a term that establishes an environmental threshold under CEQA. The use is shown as a permitted use in the M-1 (Light Industrial) zone with a Precise Development plan which is the site plan showing the exterior layout of the buildings, parking and surrounding streets. Such developments also must comply with Zoning Ordinance Chapter 19.80 Special Development Standards that have additional requirements to ensure the project complies and is compatible.

The Draft EIR is an informational document not a decision – making document and appropriately focuses on environmental impacts of the project on the environment. The project proposal is consistent with the goals and policies of the KCMBGP that are required to be analyzed under CEQA and can be found in Chapter 4.11 Land Use and Planning.

The recommendation of approval or denial of the project is not part of the CEQA Draft EIR and the comment is noted for the record as an opposition to the project and provided to the Planning Commission and Board of Supervisors for consideration.

9-J: This comment asserts that the EIR does not provide a consistency analysis with Kern Council of Governments (COG's) Regional Transportation Plan (RTP). The comment states that due to errors in modeling and modeling without supporting evidence and the EIR's determination that the project will have a significant and unavoidable impact to air quality, greenhouse gas emissions, and transportation the proposed project is directly inconsistent with Goal 1 to improve the mobility of freight, Goal 3 to improve the reliability and safety of the transportation system, and Goal 5 to promote livable communities and satisfaction of consumers with the transportation system. The comment states that the EIR must be revised to include a finding of significance due to inconsistency with the 2022 RTP document.

The comment does not provide substantial evidence regarding any significant environmental impact. As demonstrated in the responses to the SWAPE attachment, (Responses 9AA- 9KK) the Draft EIR robustly and appropriately modeled air quality emissions in accordance with all applicable guidance. It was found that the proposed project would have less than significant air quality impacts with incorporation of mitigation measures at the project level.

The proposed project is be consistent with the RTP/SCS freight transportation goals referenced by the commenter. As noted in Section 4.17, Transportation and Traffic of the Draft EIR, impacts to local roadways would be less than significant with the implementation of Mitigation Measure MM 4.17-1, which requires improvements to Houghton Road and Union Avenue. Furthermore, the proposed project would implement a Transportation Demand Management (TDM) program and implement various TDM measures to reduce VMT impacts. In addition, the proposed project was found to have less than significant impacts related to hazardous transportation conditions with incorporation of MM 4.17-3, which requires preparation of a Construction Traffic Control Plan. Therefore, the proposed Project would have additional impacts beyond what was analyzed in the Draft EIR.

9-K: The comment states that the EIR utilizes uncertain misleading language in stating that it "is anticipated that the construction workforce would commute to the project site from local communities", which does not provide any meaningful analysis of the project's population and employment (construction or operational employees) generation. The commenter states that the EIR relies upon the County's overall unemployment rates to fill the project's jobs without providing information on whether the unemployed workforce is interested or qualified for work in construction and/or industrial sectors to reach the conclusion that "temporary and permanent employees required by the proposed project could come from the surrounding areas within the Bakersfield MSA without the need for relocation".

The comment states that the geographic boundaries of "local communities" and Bakersfield MSA" are not defined and relying on the entire labor force of Kern County to fill the project's construction and operational jobs will increase VMT and emissions during all phases of construction and operations and a revised EIR must be prepared to provide demographic and geographic information on the location of qualified workers to fill these positions.

The comment does not provide substantial evidence regarding any significant environmental impact. As described in Section 4.14, Population and Housing, the unemployment rate in the proposed project region was 7.5 percent in September 2023. This regional unemployment rate is above the California unemployment rate (4.8 percent) and national average (3.6 percent). In 2023, the annual average number of individuals participating in the Kern County labor force was 387,500; of these, 360,500 were employed, leaving 27,000 actively looking for work. Thus, the temporary and permanent employees required by the proposed project (1,830 total during peak season) could reasonably come from the surrounding areas without the need for relocation. The environmental effects (i.e., air pollutant and greenhouse emissions associated with vehicle miles traveled for worker trips) associated with employees have been accounted for throughout the Draft EIR, for example within the project's air quality and greenhouse gas emission analyses. In this case, because the exact locations of where workers trips would originate are too speculative to identify precisely, the analyses assumed a default worker trip. This default is a reasonable estimate of the average trip. Finally, the proposed project does not require any specialized construction methods that would require specialized construction workers to be sourced outside of the region nor are specialized employment opportunities anticipated at buildout. Therefore, the Draft EIR reasonably concludes that the workers in the project vicinity, due in part to the areas above average unemployment rate, would be able to serve the project.

9-L: The comment summarizes employee estimates included in the Draft EIR, purporting that the EIR did not provide a source of methodology for the calculations. The comment claims that the EIR

must be revised to include the background data and methodology for determining the quantity of construction and operational jobs.

The comment does not provide substantial evidence regarding any significant environmental impact. Employment was calculated based on information from the project applicant, which has extensive experience in developing and constructing these types of projects and industry standards for similar projects. The number of jobs identified in the Draft EIR is an estimate as the exact future end-users are unknown and cannot be known at this time. Thus, the number of jobs that the proposed project would generate cannot be precisely quantified. Based off of these employment generation estimates, the Draft EIR concluded that the proposed project could generate approximately 915 on-site employees per shift (two shifts, for a total of 1,830 employees) in peak season and approximately 732 on-site employees per shift (two shifts for a total of 1,464 employees) in non-peak season during operation, which is line with growth projections in the General Plan. Moreover, by developing an employment generating use, the proposed project would further General Plan Goals and Policies to provide job opportunities for those living in the area that may currently commute out of the area for work and/or the proposed project would help to reduce the commute time of residents by providing new opportunities closer to home for Kern County residents. Information regarding the number of jobs created by construction and operation of the project is not an environmental impact, and thus is not required under CEQA. *County of Butte v Department of Water Resources* (2023) 90 CA5th 147

9-M: The comment states that the cumulative analysis for Population and Housing utilizes uncertain and misleading language that "a number of warehouse projects are proposed in the project vicinity. All of these projects may have the potential to induce population growth, however, they would be able to be staffed by the existing regional workforce in the County". The comment purports that there is no quantification of the employees for cumulative projects to accurately demonstrate the available workforce can absorb these employees without inducing growth.

The comment further claims that the Draft EIR statement of "cumulative projects would be required to address potential environmental impacts as part of their individual project review" is an erroneous and misleading statement given the ability of any project to generate significant and unavoidable impacts, and the lead agency's ability to adopt a statement of overriding considerations, meaning other projects may contribute to negative impacts in the area.

Finally, the comment claims that the statement of "cumulative projects would be consistent with planned growth within the County" is incorrect, as four projects listed in Table 3-5 require a GPA, ZC, or both, indicating that these projects are not consistent with planned growth in the County.

The comment does not provide substantial evidence regarding any significant environmental impact. The comment fails to identify a potential environmental impact related to the physical environment. The applicable threshold of significance with regard to population and housing raises the question of whether a project would result in substantial unplanned population growth such that new housing would be required and the construction of such housing would result in environmental effects. Given the size of the available workforce and the current unemployment numbers in the County and the region, there is no evidence that the proposed project would necessitate the construction of more housing units than anticipated as a result of employment opportunities associated with the project. As such, the Draft EIR adequately and accurately describes potential

environmental effects associated with construction workers and construction of the project as well as operation.

9-N: The comment summarizes the Draft EIR statement of "given a conservative analysis and assuming that all employees relocate to the area, the proposed project would account for a very small percentage of the projected population increase predicted by Kern COG.

The comment states that the proposed project would account for 10.1 percent of the Metro Bakersfield's employment growth from 2020-2035, and claims that a single project accounting for 10.1 percent of the projected employment growth represents a significant amount of growth. The comment claims that the EIR must be revised to include this analysis, and also provide a cumulative discussion of projects approved since 2020 and projects "in the pipeline" to determine if the project will exceed employment and/or population growth forecast. The comment refers to the Majestic Gateway Bakersfield project, purporting that when considered with the proposed project, the two projects will cumulatively generate 18.5 percent of the Metro Bakersfield's employment growth forecast over 15 years, both of which require changes in land use designations to proceed. The comment claims that this total increases exponentially when other industrial and commercial development activity is added to the calculation.

The comment states that a revised a revised EIR must be prepared to include this information for analysis, and also provide a cumulative analysis discussion of projects approved since RTP adoption and projects "in the pipeline" to determine if the proposed project will exceed the employment/population growth forecasts by Kern COG, Kern County General Plan, and/or the MBGP. The comment does not provide substantial evidence regarding any significant environmental impact.

As noted in Response 9-H and 9-L, employment generated by the proposed project would be within Metro Bakersfield's anticipated employment growth; therefore, it would not result in unanticipated growth that would lead to the need for unplanned housing.

9-O: The comment states that the EIR is required to evaluate a reasonable range of alternatives to the proposed project which will avoid or substantially lessen any of the significant effects of the proposed project. The commenter purports that the alternatives chosen for analysis include the CEQA required "No Project" alternative and only two others. The comment states that the EIR does not evaluate a reasonable range of alternatives beyond the No Project Alternative. The commenter states that the EIR does not include an alternative that meets the project objectives and also eliminates all of the project's significant and unavoidable impacts.

The comment states that the EIR must be revised to include analysis of a reasonable range of alternatives and foster informed decision making. This must include alternatives such as development of the site with a project that reduces all of the proposed project's significant and unavoidable impacts to less than significant levels.

The comment does not provide substantial evidence regarding any significant environmental impact. A general response to a general comment is sufficient. 14 Cal Code Regs §15088(c) This comment provides a general objection to the alternatives discussion; however, it does not propose any specific alternatives for evaluation. The Draft EIR evaluated three different alternatives in Section 6.4. Although none of the alternatives eliminated all of the project's significant and unavoidable impact, there is no requirement for such an alternative in CEQA.

9-P: The comment provides concluding remarks, purporting that the EIR is flawed and a revised EIR must be prepared for the proposed project and recirculated for public review. The comment requests that GSEJA be added to the public interest list regarding any subsequent environmental documents, notices, public, hearings, and notices of determination for the project, and provides a mailing address for all communications to GSEJA.

GSEJA has been added to the notification list for the project and the comment is noted for the record.

Response to Soil Water Air Protection Enterprise (SWAPE)

9AA: This is an introductory comment to the attached letter stating that Draft EIR has been reviewed by SWAPE. The comment states that the Draft EIR inadequately analyzes impacts to air quality, health risk, and GHG emissions. The comment states that impacts related to construction and operation of the proposed project are underestimated, and requests that a revied EIR be prepared.

Please see responses below 9-BB – 9-KK below.

9-BB: This comment states that the proposed project utilized CalEEMod Version 2022.1 to analyze potential air quality impacts generated by the proposed project. The comment states that, while the use CalEEMod is standard practice in CEQA evaluation, Version2022.1 is a 'soft release' and does not include complete output files. The commentor writes that without the ". JSON" output files for the analysis included in the Draft EIR, the included air modeling and analysis cannot be fully evaluated and verified. The commentor requests a revised EIR be prepared that includes updated air quality analysis and complete output files from CalEEMod Version 2022.1.

The comment is informational in nature and does not raise any specific concerns with the adequacy of the Draft EIR or raise any other specific CEQA issue. It is typical that default CalEEMod data is revised, so that the modeling accurately depicts construction and/or operation of the proposed project.

The commenter is incorrect that CalEEMod 2022.1 is a "soft release". As indicated in the

CalEEMod release notes, CalEEMod version 2022.1 was approved for full launch on 12/21/2022 and the "soft release" message was removed. As such, CalEEMod version 2022.1 is appropriate for use and the analysis is adequate as presented.

In addition, as discussed on pages 10 and 11 of the CalEEMod User's Guide for CalEEMod version 2022.1, CalEEMod was designed to allow the user to change the defaults to reflect site- or project-specific information when available. Thus, modifications to CalEEMod defaults are used when more detailed information is known about the project such as architectural coating parameters and operational vehicle trip values. Modifications made to the CalEEMod defaults as a part of this Project were done in order to provide an accurate snapshot of the project's construction and operational details. Modifications to defaults and the explanations are noted in the output report. Page 32 of Appendix B.1 CalEEMod Output identifies the user changes that were made CalEEMod. As for the commenter's request for the ".JSON" "output" files, the ".JSON" files are input files, not output files. As such, all output files were included in Appendix B of the Draft EIR.

It should also be noted that all relevant modeling data, including the ".JSON" input files were provided to SJVAPCD (the CEQA Responsible Agency for air quality considerations) for review. As shown in their comment letter, SJVAPCD has not found the emission modeling in CalEEMod to be deficient in any manner.

No revisions are required and no further response is required or provided.

9-CC: This comment states that, in addition to the CalEEMod output issues discussed in the previous comment, several inputs were inconsistent with information disclosed in the Draft EIR. The commentor requests a revised EIR be prepared that includes updated air quality analysis that adequately evaluates potential impacts on local air quality.

The responses below demonstrate that the air quality modeling was robustly prepared to accurately estimate project construction and operation emissions. No further response is needed.

9-DD: This comment states that between the construction and operations reports for the attached CalEEMod output files, changes to default architectural coating emission factors were altered. The comment argues that these changes remain unsubstantiated, and that only the square footage of the area to be coated and not the coating emissions factors are provided, disallowing for independent verification.

The project's CalEEMod modeling was prepared in accordance with the CalEEMod User Guide. The CalEEMod User Guide provides equations for interior and exterior walls are based on correlations based on the building footprint and the apportionment of 75 percent of the coating to the interior walls and 25 percent for exterior walls, or assuming a 3:1 ratio of interior to exterior walls. The warehouse building has few interior walls and the ratio of interior to exterior walls was modified to be more project-specific for the warehouse, hence the change from default.

The project's building drawings were used to estimate the square footage of exterior and interior wall square footage (with additional interior walls in only a small portion of the building in the office and security areas). These estimates take into account the building heights and floor plans. The ratio of the interior to exterior wall space was estimated as 1.5 times (as opposed to CalEEMod factor of 3 for interior to exterior). The exterior wall space area was estimated as considerably less than CalEEMod default, but not adjusted from the CalEEMod default, in order to maintain conservative emissions estimates. For clarifying purposes, details of the CalEMod defaults, building estimates and the modeled interior and exterior surface area values have been included the updated Appendix B.

The analysis therefore properly relied on project-specific data to conservatively estimate coating for interior and exterior walls accurately reflecting the required construction activities necessary for project buildout. The commenter has not provided any supporting documentation as to why the assumptions used in the analysis would not be representative of the project's architectural coating related emissions. This analysis is adequate as presented. Therefore, no further response is required or provided.

9-EE: This comment states that the output files for the "Westside Industrial Project – Operations 2026 Custom Report" model include changes to the default vehicle trip values. As described in the previous comment, changes to emissions factors within CalEEMod must be substantiated. The Draft EIR includes the trip generation values for the proposed project, however it does not demonstrate with values are inputted into the model. As such, this comment states that the changes cannot be analyzed and verified to be accurate.

The project's CalEEMod modeling was prepared in accordance with the CalEEMod User Guide. As it relates to calculating mobile emissions based on operational vehicle trip values, the CalEEMod User Guide Appendix C - Emission Calculation Details for CalEEMod specifically encourages the user to replace these rates with project-specific vehicle trip rates whenever possible. Similarly, the User Guide also recommends using project-specific trip length data. In accordance with CalEEMod User Guide and SJVAPCD guidance, default values were replaced with project-specific trip rates and trip length which were provided by the project transportation analysis and documented in detail in the CalEEMod outputs.

Documentation of the proposed project trip rates and lengths used in the modeling are from traffic study for the project and goods movement studies for the region are contained in Appendix B-1 Air Quality, Greenhouse Gas Emissions, and Energy Analysis Report, Table 9 and 10 – Proposed Project Trip Generation.

The analysis properly relied on Project-specific trip data that accurately reflect the anticipated vehicle trips during project operation. The commenter has not provided any supporting documentation as to why the assumptions used in the analysis would not be representative of the Project's mobile source emissions. This analysis is adequate as presented. Therefore, no further response is required or provided.

9-FF: This comment states that the output files for the "Westside Industrial Project – Operations 2026 Custom Report" model include changes to the default operational vehicle fleet mix percentages. As with the previous comments, the output files for CalEEMod do not include the numeric changes to any model defaults. The comment states that the models included cannot be verified as accurate until the Draft EIR verifies the breakdown of heavy-heavy duty ("HHD"), medium-heavy duty ("MHD"), and light-heavy duty ("LHD1, LDH2"), trucks used by the proposed project.

Similar to Response to E, above, the default operational fleet mix has been replaced with project-specific data which accurately reflects the type and mix of vehicles that would travel to and from the project site during operation.

Documentation of the truck mix used in the modeling is contained in Appendix B-1 Air Quality, Greenhouse Gas Emissions, and Energy Analysis Report, Table 11: Vehicle Classification – Project Operational Fleet Mix. This specifies that 100 percent of the trucks are modeled as Heavy-Heavy Duty Trucks (HHDT).

The analysis properly relied on Project-specific trip data that accurately reflected the anticipated vehicle trips during project operation. The commenter has not provided any supporting documentation as to why the assumptions used in the analysis would not be representative of the Project's mobile source emissions. This analysis is adequate as presented. Therefore, no further response is required or provided.

9-GG: The commenter claims that the project's health risk assessment is incorrect due to usage of unsubstantiated modeling. As demonstrated in Response 9-BB through 9-FF, the Draft EIR robustly and appropriately estimated air quality emissions following all applicable guidance. Therefore, the health risk assessment is based on valid air quality emission data and reflects an accurate estimation of health risk impacts of project construction.

The construction health risk assessment was prepared and follows the methodologies prescribed in the Cal/EPA/OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments (OEHHA 2015), which was adopted in 2015 replacing the previous 2003 guidance manual. HRA assumptions and results are provided in Appendix B of this Draft EIR. The HARP program was used to automatically calculate the health risk for the proposed project. Use of the HARP program ensures that the calculational procedures for cancer and noncancer risk follow the OEHHA 2015 Guidelines and that age sensitivity factors and fraction of time at home parameters are applied correctly. The HARP output files which are include in Appendix B – Health Risk Appendix Supporting Information of the B-1 Air Quality,

Greenhouse Gas Emissions, and Energy Analysis Report detail how the HARP model was applied and document the appropriate HRA parameters for ASF and FAH for exposure,

Therefore, the project health risk assessment was appropriately prepared and represents an accurate estimate of health risk impacts during construction. Health risk impacts were found to be less than significant. No further response is needed.

9-HH: The comment states that the DIE estimates that the project would result in net annual GHG emissions of 14,232 metric tons of carbon dioxide equivalent per year (MT CO2e/year). The comment states that the project would result in a significant and unavoidable GHG impact despite implementation of Mitigation Measures MM 4.17-2, MM 4.8-1, and MM 4.8-2. The comment states that the Draft EIR concludes that the project would result in a significant and unavoidable GHG impact due to implementation of all feasible mitigation measures.

The commenter states that the Draft EIR fails to substantiate the claim that all feasible and available mitigation measures have been implemented.

The commenter states that to reduce the project's GHG impacts to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those listed below under Comment 9-II. the commenter states that the project should not be approved until revised EIR is prepared, incorporating all feasible mitigation to reduce emissions to the maximum extent feasible.

See Response to AFTE – 9-BB. In summary, the County as lead agency elected to analyze the project's GHG impact significance based on project consistency with applicable State and regional GHG reduction plans. The project's significant GHG impact is solely due to the project's significant VMT impact. All feasible mitigation measures with legal nexus to the impact have been considered and incorporated. Therefore, no additional mitigation measure is necessary or considered. No additional response is needed.

9-II: The comment states that SWAPE's analysis demonstrates that the project would result in potentially significant air quality, health risk, and GHG impacts that should be mitigated further. The comment provides a list of mitigation measures found in the California Department of Justice Warehouse Project Best Management Practices document and suggests that the project should consider implementation of such measures to reduce emissions.

CEQA recognizes that a lead agency may decline to adopt a mitigation measure that it concludes will not be effective in mitigating an impact or that will not provide substantial additional mitigation beyond the measures that it does adopt. Citizens for Open Gov't v City of Lodi (2012) 205 CA4th 296, 323; A Local & Reg'l Monitor (ALARM) v City of Los Angeles (1993) 12 CA4th 1773.

As detailed in the Draft EIR, the proposed project would not have significant impacts related to criteria pollutants or health risks during construction and operation with implementation of MM 4.3-1 through MM 4.3-10. The proposed project would have a significant GHG impact due to inconsistency with VMT reduction goals set forth in the RTP/SCS and scoping plan, even with the implementation of MM 4.17-2, MM 4.8-1, and MM 4.8-2.

The comment provides a list of recommended measures taken from the California Attorney General's Bureau of Environmental Justice "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" (Warehouse Projects Best Practices Memorandum). Please see Section 4.8. Greenhouse Gas Emissions of Section 7.2,

Revisions to the Draft EIR, as well as Response 10-B below, for a detailed discussion of the measures from the Warehouse Project Best Practices Memorandum that the proposed project would be implementing. Although the commenter provides a list of recommended measures, the commenter has not submitted any evidence to demonstrate that the additional suggestions would provide substantial additional mitigation. Nonetheless, the Table below compares the comment's recommended measure with the regulations and measures currently applied to the Project.

As detailed below, many of the recommended measures are required to be implemented by existing regulations and/or are included as part of the proposed mitigation measures. The measures that are not included are either not applicable to the Project, not required as Project impacts related to the recommended measure would not occur, or because the Project applicant and the County do not have the authority to require the measure and therefore are infeasible, as detailed below.

Comment's Recommended Measure	**Project Inclusion/Applicability**
Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.	As required by Mitigation Measure MM 4.3-3 C), construction equipment shall not operate longer than eight cumulative hours per day. (As shown Section 7.2, Revisions to the Draft EIR, a typographical error is revised in MM 4.3-3 to state "Construction equipment shall not operate longer than eight cumulative hours per day.") Therefore, MM 4.3-3 is more stringent and effective than this recommended measure.
Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.	Table 4.3-4 of the Draft EIR shows that construction emissions would not exceed SJVAPCD thresholds, and that impacts would be less than significant. Thus, there is no nexus to provide additional measures such as designating charging area for electric-powered vehicles and equipment.
Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.	Table 4.3-4 of the Draft EIR shows that construction emissions would not exceed SJVAPCD thresholds, and that impacts would be less than significant. Thus, there is no nexus to provide additional measures such as prohibiting grading days.
Forbidding idling of heavy equipment for more than three minutes.	The ARB's Regulation for In-Use Off-Road Diesel Vehicles currently limits idling to no more than five consecutive minutes. The commenter has not demonstrated how he recommended mitigation would clearly lessen any significant environmental impacts compared to the mitigation measure already evaluated in the Draft EIR.
Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.	As required by Mitigation Measure MM 4.3-3, all equipment shall be maintained in accordance with the manufacturer's specifications. The recommended mitigation would not clearly lessen any significant environmental impacts, nor is the recommended mitigation considerably different from the mitigation measure already evaluated in the Draft EIR.
Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.	Table 4.3-4 of the Draft EIR shows that construction emissions would not exceed SJVAPCD thresholds, and that impacts would be less than significant. Thus, there is no nexus to provide additional measures such as

Comment's Recommended Measure	Project Inclusion/Applicability
	additional VOC requirements beyond what is required by SJVACPD Rule 4601 Architectural Coatings.
Providing information on transit and ridesharing programs and services to construction employees.	Table 4.3-4 of the Draft EIR shows that construction emissions would not exceed SJVAPCD thresholds, and that impacts would be less than significant. Thus, there is no nexus to provide additional measures such as construction trip reduction.
Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.	Table 4.3-4 of the Draft EIR shows that construction emissions would not exceed SJVAPCD thresholds, and that impacts would be less than significant. Thus, there is no nexus to provide additional measures such as providing meal options onsite or shuttles for construction employees.
Requiring all heavy-duty vehicles engaged in drayage to or from the project site to be zero-emission beginning in 2030.	The project applicant and the County do not have the authority to require future tenants and vendors to utilize heavy-duty vehicles for trips to and from the site that are zero-emissions beyond current regulations. Thus, this measure is infeasible. However, mobile emissions would continue to decline rapidly for future buildout years based on currently applicable regulations and mitigation measures adopted by the proposed project. However, other commitments and regulations (such as the conversion to ZEV trucks and implementation of the advanced clean fleets) are on future timelines based on technical feasibility and as such the proposed project is aligned with the States 2030 and 2045 GHG goals. The ARB has carefully considered technology availability and infrastructure, in relationship to truck travel and fleet usage in its development of the Advanced Clean Fleet Regulation. Elements of the proposed project such as ZEV infrastructure for cars and trucks, would support the implementation of these regulations and are consistent with State GHG reduction policies.
Requiring on-site equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.	As required by Mitigation Measure MM 4.8-1, only electric-powered off-road equipment (e.g., forklifts, indoor material handling equipment, etc.) shall be utilized on-site for daily warehouse and business operations. The recommended mitigation would not clearly lessen any significant environmental impacts, nor is the recommended mitigation considerably different from the mitigation measure already evaluated in the Draft EIR.
Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.	The project applicant and the County do not have the authority to require future tenants and vendors to utilize light- and medium- duty vehicle that are zero-emissions beyond current regulations. Thus, this measure is infeasible.

Comment's Recommended Measure	Project Inclusion/Applicability
	However, mobile emissions would continue to decline rapidly for future buildout years based on currently applicable regulations and mitigation measures adopted by the proposed project. However, other commitments and regulations (such as the conversion to ZEV trucks and implementation of the advanced clean fleets) are on future timelines based on technical feasibility and as such the proposed project is aligned with the States 2030 and 2045 GHG goals. The ARB has carefully considered technology availability and infrastructure, in relationship to truck travel and fleet usage in its development of the Advanced Clean Fleet Regulation. Elements of the proposed project such as ZEV infrastructure for cars and trucks, would support the implementation of these regulations and are consistent with State GHG reduction policies.
Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.	Title 13, CCR, section 2485, currently limits idling of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds to no more than five consecutive minutes. The commenter has not demonstrated how he recommended mitigation would clearly lessen any significant environmental impacts compared to the mitigation measure already evaluated in the Draft EIR.
Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the air district, and the building manager.	The ARB's Regulation for In-Use Off-Road Diesel Vehicles currently limits idling to no more than five consecutive minutes. The commenter has not demonstrated how he recommended mitigation would clearly lessen any significant environmental impacts compared to the mitigation measure already evaluated in the Draft EIR.
Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.	The 2022 Building Energy Efficiency Standards (Energy Code) has solar photovoltaic (solar PV) system requirements for all newly constructed nonresidential buildings. Pursuant to Energy Code Section 140.10, The required solar PV system is intended to offset the annual electrical consumption of a mixed-fuel building such that it will self-utilize about 80 percent of the annual solar PV generation without battery storage, and about 90 percent with battery storage, over a year. The recommended mitigation would not clearly lessen any significant environmental impacts, nor is the recommended mitigation considerably different from the mitigation measure already evaluated in the Draft EIR.
Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.	As discussed in Section 4.8, Greenhouse Gas Emissions, the proposed project would include infrastructure for EV charging stations, including for trucks, into a minimum of 20 percent of all vehicle parking spaces (including parking for trucks),

Comment's Recommended Measure	Project Inclusion/Applicability
	consistent with the applicable California Green Building Standards Code Tier 1 Nonresidential Mandatory Measure. Furthermore, CALGreen 2022 update requires loading to the future location of the charging for medium- and heavy-duty ZEVs. For warehouses with greater than 256,000 square feet such as the proposed project, 400 KVA of additional capacity required for raceway, busway, transformer, and panel. The recommended mitigation would not clearly lessen any significant environmental impacts, nor is the recommended mitigation considerably different from the mitigation measure already evaluated in the Draft EIR.
Running conduit to designated locations for future electric truck charging stations.	CALGreen 2022 update includes mandatory nonresidential measures for site development electric vehicle (EV) charging under Section 5.106.5.3 Electric Vehicle Charging. Specifically, the construction documents shall indicate one or more location(s) convenient to the planned off-street loading space(s) reserved for medium- and heavy-duty Zero-Emission Vehicle (ZEV) charging cabinets and charging dispensers, and a pathway reserved for routing of conduit from the termination of the raceway(s) or busway(s) to the charging cabinet(s) and dispenser(s). Therefore, the recommended measure is not considerably different from the existing regulations with which the project must comply.
Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.	Per CALGreen 2022 update, the project's transformer, main service equipment and subpanels shall meet the minimum power requirement in Table 5.106.5.4.1 to accommodate the dedicated branch circuits for the future installation of electric vehicle supply equipment. Further, for warehouses with greater than 256,000 square feet such as the proposed project, 400 kilovolt-amps (KVA) of additional capacity required for raceway, busway, transformer, and panel. Therefore, the recommended measure is not considerably different from the existing regulations with which the project must comply.
Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)	As discussed in Section 4.8, Greenhouse Gas Emissions, the proposed project would include infrastructure for EV charging stations, including for trucks, into a minimum of 20 percent of all vehicle parking spaces (including parking for trucks), consistent with the applicable California Green Building Standards Code Tier 1 Nonresidential Mandatory Measure.

Comment's Recommended Measure	Project Inclusion/Applicability
	Therefore, the recommended measure is not considerably different from the mitigation measure already evaluated in the Draft EIR.
Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.	As discussed in Section 4.8, Greenhouse Gas Emissions, the proposed project would include infrastructure for EV charging stations, including for trucks, into a minimum of 20 percent of all vehicle parking spaces (including parking for trucks), consistent with the applicable California Green Building Standards Code Tier 1 Nonresidential Mandatory Measure. Therefore, the recommended measure is not considerably different from the mitigation measure already evaluated in the Draft EIR.
Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.	There is no nexus to provide additional measures such as air filtration systems at sensitive receptors near the Project, as impacts related to localized emissions and health risks would be less than significant as previously detailed. Thus, this measure is not included or required for the proposed Project.
Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community	There is no nexus to provide additional measures such as an air monitoring station near the Project, as impacts related to localized emissions would be less than significant as previously detailed. This measure is not included or required for the proposed Project.
Requiring all stand-by emergency generators to be powered by a non-diesel fuel.	There is no nexus to provide additional measures such as requiring non-diesel powered stand-by generators, as impacts related to localized emissions and health risks would be less than significant as previously detailed. Thus, this measure is not included or required for the proposed Project.
Requiring operators to establish and promote a rideshare program that discourages single occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.	Mitigation Measure MM 4.17-2 requires preparation of a Transportation Demand Management program that includes providing employees with information on other modes of transportation and incentives and subsidies for alternative modes of transportation. Therefore, this recommended measure is already evaluated in the Draft EIR.
Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.	Mitigation Measure MM 4.6-2 requires that prior to the issuance of grading or building permits, the project proponent shall provide evidence that the project is designed to include the green building measures specified as mandatory in the application checklists contained in the current California Green Building Standards. There is no nexus to provide additional measures such

Comment's Recommended Measure	Project Inclusion/Applicability
	as Tier 2 green building standards beyond the mandatory building standards, as impacts related to localized emissions and health risks would be less than significant as previously detailed. Thus, this measure is not included or required for the proposed Project.
Designing to LEED green building certification standards.	As required by Mitigation Measure MM 4.6-1, the project applicant shall incorporate energy efficiency designs which could include designing buildings to meet LEED® certification standards. The recommended mitigation would not clearly lessen any significant environmental impacts, nor is the recommended mitigation considerably different from the mitigation measure already evaluated in the Draft EIR.
Providing meal options onsite or shuttles between the facility and nearby meal destinations.	As required by Mitigation Measure MM 4.17-2, the project applicant shall implement a Travel Demand Program that includes measures including alternative mode subsidies and incentives, travel behavior change program, promotions and marketing, commute assistance center, preferential carpool/vanpool parking spaces, passenger loading zones, and bike share. The recommended mitigation would not clearly lessen any significant environmental impacts, nor is the recommended mitigation considerably different from the mitigation measure already evaluated in the Draft EIR.
Posting signs at every truck exit driveway providing directional information to the truck route.	There is no nexus to provide additional measures such as additional truck route signage, as impacts related to localized emissions and health risks would be less than significant as previously detailed. Thus, this measure is not included or required for the proposed Project.
Improving and maintaining vegetation and tree canopy for residents in and around the project area.	Mitigation Measure MM 4.1-3 requires the project applicant to submit a landscape plan that complies with the Kern County Zoning Ordinance requirements in Chapter 19.86–Landscaping. Specifically, the landscape plan requires a 20-foot wide perimeter buffer along any visible boundary from the Houghton Road and Wible Road frontages consisting of ground cover, shrubs, and trees. The recommended mitigation would not clearly lessen any significant environmental impacts, nor is the recommended mitigation considerably different from the mitigation measure already evaluated in the Draft EIR.
Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB approved courses. Also require facility	The project's operational permitting may require CARB compliance training and vehicle record keeping to demonstrate compliance with existing regulations. This determination is part of the County's development

Comment's Recommended Measure	Project Inclusion/Applicability
operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.	review and operational permitting process. This consists of ensuring compliance with existing regulations and does not consist of a mitigation measure.
Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program and requiring tenants to use carriers that are SmartWay carriers.	The project applicant and the County do not have the authority to require future tenants and vendors to enroll into these programs. Thus, this measure is infeasible.
Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.	The future operational permitting requirements may include provision of trucking fleet incentives. However, the Project applicant and the County do not have the authority to require future tenants and vendors to enroll into incentive programs; and fleet upgrades are generally driven by existing ARB emissions requirements. Further, there is no nexus related to a reduction in impacts to require this recommendation to be included as a mitigation measure.

9-JJ: The comment states that a revised EIR should be prepared to include all feasible mitigation measures, as well as include updated air quality, health risk, and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent feasible. The comment states that the revised EIR should also demonstrate a commitment to the implementation of these measures prior to project approval, to ensure that the project's potentially significant emissions are reduced to the maximum extent possible.

As substantiated by the previous responses above, none of the conditions arise which would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

No new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented, there is no substantial increase in the severity of an environmental impact, no feasible project alternative or mitigation measure considerably different from others previously analyzed would lessen the environmental impacts of the proposed project.

9-KK: The comment provides a disclaimer regarding the information included in the comment letter. The comment does not raise any specific concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

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Comment Letter 10: Advocates for the Environment (AFTE)

April 8, 2024

Advocates for the Environment

A non-profit public-interest law firm
and environmental advocacy organization

Mark Tolentino
Planner III
Kern County Planning and Natural Resources Department
2700 M Street, Suite 100
Bakersfield, CA 93301

Via U.S. Mail and email to TolentinoM@kerncounty.com

Re: Comments on Draft Environmental Impact Report for Westside Industrial Project by Seefried Industrial Properties, SCH No. 2023100467

Dear Mr. Tolentino:

Advocates for the Environment submits the comments in this letter regarding the Draft Environmental Impact Report (**DEIR**) for Westside Industrial Project (**Project**). The Project Site is located near Houghton Road & Wible Road in unincorporated Kern County (**County**). The Project proposes to develop the 93.74-acre Project Site by constructing a 653,442 square-foot warehouse. We have reviewed the DEIR and submit comments regarding the sufficiency of the DEIR's Greenhouse-Gas (**GHG**) analysis under the California Environmental Quality Act (**CEQA**). 10-A

The County Should Require the Project to be Net-Zero

Given the current regulatory context and technological advancements, a net-zero significance threshold is feasible and extensively supportable. GHG emissions from buildings, including indirect emissions from offsite generation of electricity, direct emissions produced onsite, and from construction with cement and steel, amounted to 21% of global GHG emissions in 2019. (IPCC Sixth Assessment Report, Climate Change 2022, WGIII, Mitigation of Climate Change, p. 9-4.) This is a considerable portion of global GHG emissions. It is much more affordable to construct new building projects to be net-zero than to obtain the same level of GHG reductions by expensively retrofitting older buildings to comply with climate change regulations. Climate damages will keep increasing until we reach net zero GHG emissions, and there is a California state policy requiring the state to be net-zero by 2045. It therefore is economically unsound to construct new buildings that are not net-zero. 10-B

Environmental groups have achieved tremendous outcomes by litigation under CEQA. Two of the largest mixed-use development projects in the history of California, Newhall Ranch (now FivePoint Valencia), and Centennial (part of Tejon Ranch) decided to move forward as net-zero communities after losing CEQA lawsuits to environmental groups. The ability for these large projects to become net-zero indicates that it is achievable, even for large-scale developments. The Applicant for this Project should do the same.

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We urge the County to adopt net-zero as the GHG significance threshold for this project. This threshold is well-supported by plans for the reduction of GHG emissions in California, and particularly the CARB Climate Change Scoping Plans. The CARB 2017 Scoping Plan states that "achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development." (CARB 2017 Scoping Plan, p. 101.) Additionally, the CARB 2022 Scoping Plan reaffirms the necessity of a net zero target by expressing: "it is clear that California must transition away from fossil fuels to zero-emission technologies with all possible speed … in order to meet our GHG and air quality targets." (CARB 2022 Scoping Plan, p. 184.) CARB further encourages a net-zero threshold in its strategies for local actions in Appendix D to the 2022 Scoping Plan. (CARB 2022 Scoping Plan, Appendix D p. 24-26.) 10-B

Moving this Project forward as a net-zero project would not only be the right thing for the County to do, but also would also help protect the County and the Applicant from CEQA GHG litigation.

GHG Mitigation is Insufficient under CEQA

The calculated project-related emissions amount to 14,232 metric tons of carbon dioxide equivalent (MTCO2e) per year (DEIR, p. 4.8-22). The County adopted a significance threshold based on Appendix G of the CEQA Guidelines. Based on this threshold, County concluded the Project would have significant GHG emissions. To reduce this identified significant GHG impact, the GHG Analysis offered Mitigation Measures AQ/mm-4.17-2, which would implement a transportation demand management program (**TDM**); MM 4.8-1, to require only electric-powered off-road equipment to be utilized on-site for daily warehouse and business operations; and MM 4.8-2, to limit warehouse usage to dry storage. (DEIR, p. 4.8-25; p. ES 1-81.) 10-C

The DEIR did not include any quantitative estimate of the effectiveness of the proposed mitigation in reducing GHG emissions, nor did it provide evidence that there was no further mitigation, stating the following: "sometimes the only feasible mitigation for cumulative impacts may be to adopt ordinances or regulations rather than impose conditions on a project-by-project basis. Global climate change is this type of issue." (DEIR, p. 4.8-33.) The County did not provide any rationale why, in this instance, existing regulations would be the only feasible mitigation. Despite the availability of other GHG mitigation, the DEIR declared that the Project's mitigated emissions were unavoidable. However, because this conclusion is not supported by substantial evidence, the DEIR should have included more mitigation to reduce the Project's GHG emissions to the extent required by CEQA.

Infeasibility Finding Lacks Substantial Evidence

The conclusion that the Project will not be able to achieve any mitigation beyond which was identified in the proposed mitigation measures is not supported with substantial evidence. The DEIR 10-D

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should have proposed more mitigation measures to be applied to the maximum-feasible extent in order to justify the conclusion that the Project's GHG impact would be unavoidable due to lack of feasibility of further mitigation. While the proposed mitigation measures are a good start, the County did not demonstrate that these actions would represent the maximum feasible mitigation to support a finding that the Project's impact would be significant and unavoidable.

CEQA requires that the lead agency identifies specific reasons for infeasibility of further mitigation when concluding significant and unavoidable impact. The County did not attempt to specify any infeasible mitigation measures when concluding that the Project's GHG impact would be unavoidable, nor did it provide any reasoning that the identified mitigation measures represent the maximum feasible mitigation. 10-D

Thus, the conclusion that further mitigation is infeasible was not supported by substantial evidence; there are other readily available mitigation measures, especially considering that the majority of the impact originates from mobile emissions which the mitigation measures were not focused on reducing. The County and Applicant together can commit to design and technology specifications that reduce emissions, especially in the heavy-duty truck and transportation vehicle fleet. Further, the County can choose to further reduce energy usage by adopting more green building features beyond which have already been incorporated by existing mitigation measures.

The Project's GHG Impacts Must be Fully Mitigated

CEQA requires that the Project include fair-share mitigation for all significant cumulative impacts. (*Napa Citizens for Honest Gov't v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 364.) Here, this means mitigation of the full extent of the Project's GHG impacts. The DEIR claims that no other mitigation measures are feasible, beyond the identified mitigation measures. But that conclusion is incorrect, and not supported by substantial evidence.

The amount of GHG emissions that comprises the Project's fair share is clear. The Project's mitigated annual emissions were estimated at 14,232 MTCO2e, and the reasonable lifespan this Project is approximately 30 years, as indicated by the amortization of construction emissions. (DEIR, p. 4.8-21.) Therefore, the Project would likely contribute to approximately 426,960 MTCO2e during its entire lifespan.[1] This would be a good starting point from which to subtract the effect of additional non-offset mitigation measures, before implementing offset purchases. 10-E

In addition to implementing zero-emission vehicle fleets to the extent feasible, there are several on-site mitigation measures that are feasible, including solar water heaters and automatic light switches, among many other mitigation strategies that can be incorporated in the project as design features or as mitigation measures. Such features could be adopted individually or as part of a

[1] 14,232 MTCO2e per year × 30 years = 426,960 MTCO2e

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comprehensive goal of sustainable building certification, such as Leadership and Energy and Environmental Design (**LEED**), that extends further beyond CALGreen requirements.

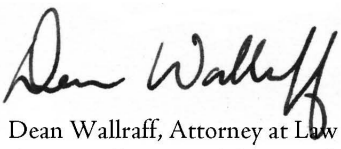
Even after implementing on-site emissions reductions to the maximum-feasible extent, the County could also require the Applicant to enter into an agreement to have a zero-emission heavy-duty truck fleet as soon as feasible and to buy clean power for the warehouse's remaining electricity usage that it is unable to produce through solar power on-site. The County could also require the Applicant to purchase offsets to the extent necessary to mitigate the Project's emissions to the fair share extent. 10-E

Overall, there are more options available to mitigate emissions to the full extent of project emissions.

Conclusion

The DEIR fails to require all feasible mitigation, despite concluding that the significant GHG impact will be unavoidable. The lead agency has not met its burden of showing that such measures are infeasible, and therefore the DEIR should be amended to reflect all feasible mitigation to the fair-share extent. Please put me on the interest list to receive updates about the progress of this Project. We make this request under Public Resources Code, section 21092.2. 10-F

Sincerely,



Dean Wallraff, Attorney at Law
Executive Director, Advocates for the Environment

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Response to Comment Letter 10 : Advocates for the Environment (AFTE)

10-A: This comment reiterates the project description of the proposed project and states that the commentor has reviewed the proposed project and found issues with the sufficiency of the Draft EIR's Greenhouse Gase analysis.

This comment does not raise any specific issues. See responses below addressing specific comments. No response is required.

10-B: This comment states that the proposed project should be held to a net-zero significant threshold. The comment argues that proactive measures to achieve net-zero emissions from buildings are more cost effective than retrofitting measures. The commentor provides reference to similar projects taking proactive net-zero measures. The commentor cites the CARB 2017 Scoping Plan and CARB 2022 Scoping Plan which encourage and state the ultimate necessity of achieving net-zero emissions, arguing that holding the proposed project to a net-zero significance threshold would thus protect the proposed project form future CEQA GHG litigation.

The comment does not provide substantial evidence regarding any significant environmental impact. Section 4.8, Greenhouse Gas Emissions, of the Draft EIR robustly evaluates the proposed project's GHG impacts, both from a quantitative and qualitative perspective. Section 4.8.4 describes the significance criteria, assumptions and methodologies used by the County, in its discretion, to conduct this impact analysis.

CEQA does not require the County to utilize achieving net-zero GHG emissions as a significance threshold to evaluate the proposed project. Moreover, Lead Agencies have discretion to formulate their own significance thresholds (State CEQA Guidelines Section 15064.7(b)). The determination by a lead agency of whether a project may have a significant effect on the environment calls for careful judgment, based to the extent possible, on scientific and factual data (State CEQA Guidelines Section 15064(b)(1)). Thus, establishing a single threshold of significance, while desirable in certain instances, may not be possible for every environmental impact, because the significance of an impact may vary with the setting. The final determination of whether a project is significant is within the purview of the County, as lead agency pursuant to Section 15064(b) of the CEQA Guidelines.

Here, the County has chosen to evaluate the proposed project against applicable State and regional GHG reduction plans, including ARB 2017 scoping plan, 2022 scoping plan update, and RTP/SCS. As discussed in Draft EIR Section 4.8, Greenhouse Gas Emissions, an evaluation of the proposed project's consistency with the Scoping Plan serves as a roadmap for evaluating a project's current design, and to determine whether it complies with current policies and is in compliance with planned reduction measures for GHG emissions. The proposed project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable to the proposed project.

Contrary to the commenter's assertion, the 2017 Scoping Plan and 2022 Scoping Plan Update do not require projects to be net-zero. As described in the ARB 2017 Scoping Plan, "achieving net-zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net-zero does not imply the project results in a substantial contribution to the

cumulatively significant environmental impact of climate change under CEQA." (Page 102) In addition, the commenter erroneously cites language from the 2022 Scoping Plan that is not applicable to the proposed project. The net-zero threshold recommendation as stated in Appendix D of the 2022 Scoping Plan was intended for residential and mixed-use development that is not applicable to the proposed industrial project.

The Newhall and Tejon Ranch GHG reduction strategies were the result of settlements with the environmental community; however, those cases were based, in part, on substantial legal deficiencies in the underlying environmental documents. As explained above, there is no evidence of a similar legal deficiency in the Draft EIR.

Therefore, the Draft EIR for the proposed project robustly evaluated all potential GHG emissions impacts using appropriate thresholds, and identified feasible mitigation where necessary. Clarifications have been added to Chapter 4.8, Greenhouse Gas Emissions to discuss relevant GHG reduction measures to be implemented by the proposed project, as follows:

Additions to the Draft EIR text are shown with underlined text, and text removed from the Draft EIR is shown with ~~strikethrough~~.

Chapter 4.8, *Greenhouse Gas Emissions,* Page 4.8-23
Best Management Practices for Warehouses

In response to the increase in warehouse development in California, the California Attorney General's Bureau of Environmental Justice published a Memorandum entitled "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" (Warehouse Projects Best Practices Memorandum) (published in March 2021 and updated September 2022).

The Memorandum encourages warehouse projects to implement certain best practices and mitigation measures including those related to community engagement, siting and design considerations, and air quality and greenhouse gas emissions. As demonstrated below, a vast majority of best practices either have since become required by law or otherwise implemented as part of the project's Air Quality, Greenhouse Gas Emissions, and Transportation mitigation measures. These measures will be enforced by Kern County, and will be incorporated into the Project's Mitigation Monitoring & Reporting Program.

A summary of the measures incorporated into the Project and the EIR is provided below, in Table 4.8-5.

Table 4.8-5: Project Incorporation of Best Practices

Best Practice Measure	**Applicability and Incorporation**
Community Engagement	
Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The	**Incorporated.** The project's Notice of Preparation was published on October 17, 2023, which includes a complete and accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. A public Scoping Meeting was

Best Practice Measure	**Applicability and Incorporation**
information should be in a format that is easy to navigate and understand for members of the affected community.	held on November 8, 2023. Notices were mailed to reviewing agencies and to residents and owners within 1,000 feet of the project site. Additionally, notices were available in person at the County and on the County's website.
Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project	
Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community relations officer to the surrounding community.	**Incorporated.** Pursuant to Mitigation Measure MM 4.3-10, the project applicant shall establish a construction coordinator who will respond to any local compliant about construction activities, ensure all appropriate construction notices have been made available to the public and all construction signs have been installed, and maintain an ongoing log of all construction-related complaints.
Warehouse Siting and Design Considerations	
Creating physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are likely to be present, such as homes, schools, daycare centers, hospitals, community centers, and parks.	**Incorporated.** There are no sensitive receptors immediately adjacent to the project site, as the site is surrounded by predominately agricultural uses and bordered by established roads along the northern and western project boundaries, providing additional buffers between the site and the nearest receptors. Nonetheless, pursuant to Mitigation Measure MM 4.1-3, the project applicant shall submit a landscape plan that complies with the Kern County Zoning Ordinance requirements in Chapter 19.86–Landscaping. Specifically, the landscape plan requires a 20-foot wide perimeter buffer along any visible boundary from the Houghton Road and Wible Road frontages consisting of ground cover, shrubs, and trees.
Providing adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets.	**Incorporated.** Project plans have been reviewed by the County for adequate onsite parking and queuing in order to prevent trucks from parking or idling on public streets. Additionally, pursuant to Mitigation Measure MM 4.2-3, the project shall be designed to reduce conflicts between project operation and adjacent uses by considering designs include, but not limited to, prohibition of off-site parking.
Screening dock doors and onsite areas with significant truck traffic with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.	**Incorporated.** Pursuant to Mitigation Measure MM 4.1-3, the project applicant shall submit a landscape plan that complies with the Kern County Zoning Ordinance requirements in Chapter 19.86–Landscaping. Specifically, the landscape plan requires a 20-foot wide perimeter buffer along any visible boundary from the

Best Practice Measure	**Applicability and Incorporation**
	Houghton Road and Wible Road frontages consisting of ground cover, shrubs, and trees.
Air Quality and Greenhouse Gas Emissions Analysis and Mitigation	
Requiring off-road construction equipment to be zero-emission, where available, and all diesel-fueled off-road construction equipment, to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.	**Largely incorporated.** Pursuant to Mitigation Measure Mitigation Measure MM 4.3-3, on-road and off-road diesel equipment shall use diesel particulate filters (or the equivalent) if permitted under manufacturer's guidelines. In addition, Tier 3 engines shall be used on all equipment when available
Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.	**Incorporated.** As required by Mitigation Measure MM 4.3-3 C), construction equipment shall not operate longer than eight cumulative hours per day. Therefore, Mitigation Measure MM 4.3-3 is more stringent and effective than this recommended measure.
Providing electrical hook ups to the power grid, rather than use of diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and using electric tools whenever feasible.	**Incorporated.** As required by Mitigation Measure MM 4.3-3 D), electric equipment shall be used whenever possible in lieu of diesel- or gasoline-powered equipment.
Forbidding idling of heavy equipment for more than two minutes.	**Largely Incorporated.** The ARB's Regulation for In-Use Off-Road Diesel Vehicles currently limits idling to no more than five consecutive minutes.
Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.	**Incorporated.** As required by Mitigation Measure MM 4.3-3 A), all equipment shall be maintained in accordance with the manufacturer's specifications.
Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.	**Incorporated.** Pursuant to Mitigation Measure MM 4.3-3, the Lead Agency shall conduct an on-site inspection to verify compliance with construction mitigation.
Requiring on-site equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.	**Incorporated.** As required by Mitigation Measure MM 4.8-1, only electric-powered off-road equipment (e.g., forklifts, indoor material handling equipment, etc.) shall be utilized on-site for daily warehouse and business operations.
Forbidding trucks from idling for more than two minutes and requiring operators to turn off engines when not in use.	**Largely Incorporated.** Title 13, CCR, section 2485, currently limits idling of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds to no more than five consecutive minutes.
Constructing electric truck charging stations proportional to the number of dock doors at the project.	**Incorporated.** As discussed in Section 4.8, Greenhouse Gas Emissions, the proposed project would include

Best Practice Measure	**Applicability and Incorporation**
Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.	infrastructure for EV charging stations, including for trucks, into a minimum of 20 percent of all vehicle parking spaces (including parking for trucks), consistent with the applicable California Green Building Standards Code Tier 1 Nonresidential Mandatory Measure. Furthermore, CALGreen 2022 update requires loading to the future location of the charging for medium- and heavy-duty ZEVs. For warehouses with greater than 256,000 square feet such as the proposed Project, 400 KVA of additional capacity required for raceway, busway, transformer, and panel.
Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.	**Incorporated.** Mitigation Measure MM 4.8-2 requires the warehouse usage shall be limited to dry storage.
Installing solar photovoltaic systems on the project site of a specified electrical generation capacity, such as equal to the building's projected energy needs.	**Incorporated.** The 2022 Building Energy Efficiency Standards (Energy Code) has solar photovoltaic (solar PV) system requirements for all newly constructed nonresidential buildings. Pursuant to Energy Code Section 140.10, The required solar PV system is intended to offset the annual electrical consumption of a mixed-fuel building such that it will self-utilize about 80 percent of the annual solar PV generation without battery storage, and about 90 percent with battery storage, over a year.
Improving and maintaining vegetation and tree canopy for residents in and around the project area.	**Incorporated.** The project would include onsite and offsite landscaping, including trees having a minimum planting height of six (6) feet.
Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.	**Incorporated.** SJVAPCD Rule 8061 requires municipalities to sweep paved roads at least once per month with PM_{10} efficient units.
Directing all lighting at the facility into the interior of the site.	**Incorporated.** Pursuant to MM 4.1-4, All lighting shall be directed downward and shielded to focus illumination on the desired areas only and avoid light trespass into adjacent areas.
Using full cut-off light shields and/or anti-glare lighting.	**Incorporated.** Pursuant to Mitigation Measure MM 4.1-4, all outdoor lighting shall be designed so that all direct lighting is confined to the project site property lines and that adjacent properties and roadways are protected from spillover light and glare.
Installing climate control in the warehouse facility to promote worker well-being.	**Incorporated.** Proposed buildings would be consistent with the requirements of the California Building Code,

Best Practice Measure	Applicability and Incorporation
Installing air filtration in the warehouse facility to promote worker well-being.	including installing required climate control and air infiltration.

In addition to the measures specifically related to the Warehouse Projects Best Practices Memorandum above, Mitigation Measure MM 4.8-1 requires the project proponent utilize only electric-powered off-road equipment (e.g., forklifts, indoor material handling equipment, etc.) for daily warehouse operations, track and report efforts to recycle construction wastes, marking equipment containing more than five pounds of refrigerant for identification, and use of automatic lights where feasible to do so.

Further, as part of Mitigation Measure MM 4.3-5, the project applicant would pay fees to *fully* offset Project emissions of NO_X, ROG, PM_{10}, and $PM_{2.5}$ to avoid any net increase in these pollutants. The payment would fund SJVAPCD's emission reduction programs. Types of emission reduction projects that have been funded in the past include electrification of stationary internal combustion engines (such as agricultural irrigation pumps), replacing diesel school buses, and replacement of old farm tractors. A full analysis of the SJVAPCD Emission reduction program is found in Appendix B.1. These emission offsets and emission reduction projects would further reduce GHG emissions within the Air Basin.

Chapter 4.8, *Greenhouse Gas Emissions,* Page 4.8-25

MM 4.8-1

a. Prior to issuance of occupancy permits, the project developer shall disclose to all tenants/business entities that only electric-powered off-road equipment (e.g., forklifts, indoor material handling equipment, etc.) shall be utilized on-site for daily warehouse and business operations. The limitation on using only electric-powered off-road equipment shall be included in all leasing agreements.

b. Prior to issuance of grading or building permits, the project construction's General Contractor shall target construction waste diversion rate of 80 percent. A monthly construction report shall be provided to the County documenting total waste generated, types of waste streams and total recycled.

c. During operation and to the extent feasible for safe warehouse operations, automatic light switches shall be incorporated into the project.

e. During operation, any equipment containing greater than five pounds of refrigerant, procured or installed shall be tagged so that project applicant and tenant can identify and verify all installed equipment.

Chapter 4.8, *Greenhouse Gas Emissions,* Page 4.8-26

Table 4.8-~~5~~6, *Proposed Project Consistency with 2017 Scoping Plan Greenhouse Gas Emission Reduction Strategies* and **Table 4.8-~~6~~7,** *Proposed Project Consistency with 2022 Scoping Plan Greenhouse Gas Emission Reduction Strategies* summarize the measures included 2017 and 2022 Scoping Plans, respectively, and analyzes project consistency compared to these elements.

Table 4.8-~~5~~6: Proposed Project Consistency with 2017 Scoping Plan Greenhouse Gas Emission Reduction Strategies

Chapter 4.8, *Greenhouse Gas Emissions,* Page 4.8-29

Table 4.8-~~6~~7: Proposed Project Consistency with 2022 Scoping Plan Greenhouse Gas Emission Reduction Strategies

Chapter 4.8, *Greenhouse Gas Emissions,* Page 4.8-31

As shown in **Table 4.8-~~5~~6** and **Table 4.8-~~6~~7** above, the proposed project is consistent with most of the applicable measures in the 2017 Scoping Plan and the 2022 Scoping Plan Update with incorporation of **Mitigation Measures MM 4.8-1** and **MM 4.8-2**.

Chapter 4.8, *Greenhouse Gas Emissions,* Page 4.8-32

~~Consideration of~~ Mitigation Measures Considered and Rejected

The Office of the California Attorney General maintains a website with a list of CEQA mitigation measures for global climate change impacts. The Attorney General has listed some examples of types of mitigation measures that local agencies may consider to offset or reduce global climate change impacts from a project.

More recently, the Attorney General published the Warehouse Projects Best Practices Memorandum discussed in Impact 4.8-1. The Attorney General ensures that the presented lists are examples and not intended to be exhaustive, but instead provide measures and policies that could be undertaken. Moreover, the measures cited may not be appropriate for every project, so the Attorney General suggests that the lead agency should use its own informed judgment in deciding which measures it would analyze, and which measures it would require, for a given project.

~~The Attorney General suggests measures that could be undertaken or funded by a diverse range of projects, related to energy efficiency; renewable energy; water conservation and efficiency; solid waste measures; land use measures; transportation and motor vehicles; and carbon offsets. However, most of the suggested measures would not be applicable to the proposed project, since they are more appropriate and applicable measures to reduce long-term operational GHG emissions.~~ As discussed fully in Impacts 4.8-1 and 4.8-2, the proposed project has implemented all feasible and applicable measures to reduce air quality and GHG emissions. Either through regulatory compliance or mitigation measures, the proposed project would implement a vast majority of the recommended measures from the Attorney General's Warehouse Projects Best Practices Memorandum, carry out other state-of-the-art efficiency measures, and fully offset Project emissions of NO_X, ROG, PM_{10}, and $PM_{2.5}$ to avoid any net increase in these pollutants. The payment would fund SJVAPCD's emission reduction programs and further reduce GHG emissions within the Air Basin.

CEQA does not require the County to utilize achieving net-zero GHG emissions as a significance threshold to evaluate the proposed project. Moreover, Lead Agencies have discretion to formulate their own significance thresholds (State CEQA Guidelines Section 15064.7(b)). The

determination by a lead agency of whether a project may have a significant effect on the environment calls for careful judgment, based to the extent possible, on scientific and factual data (State CEQA Guidelines Section 15064(b)(1)). Thus, establishing a single threshold of significance, while desirable in certain instances, may not be possible for every environmental impact, because the significance of an impact may vary with the setting. The final determination of whether a project is significant is within the purview of the County, as lead agency pursuant to Section 15064(b) of the CEQA Guidelines.

Here, the County has chosen to evaluate the proposed project against applicable State and regional GHG reduction plans, including ARB 2017 scoping plan, 2022 scoping plan update, and RTP/SCS. The proposed project would be consistent with most of the applicable scoping plan policies. ~~The impacts on global warming and climate change are indirect, climate change is a worldwide phenomenon, and project-level emissions cannot be correlated with specific impacts based on currently available science.~~ However, based on the analysis above, the proposed project would not align with the State's planning goals and milestones under SB 32 and AB 1279 due to the proposed project's VMT per capita. Feasible and enforceable mitigation with a nexus to the project's VMT impact were considered in the proposed project's VMT impact and in Section 4.17, *Transportation*. Although the proposed project would be required to implement a TDM program to reduce VMT, it is unclear whether the TDM program would reduce project VMT to the VMT reduction targets set forth in the Kern COG RTP/SCS. Therefore, the proposed project is expected to significantly contribute to global warming or climate change.

10-C: This comment states a summary of the GHG analysis included in the Draft EIR, including County thresholds and required mitigation measures. The comment states that no quantitative estimates of the effectiveness of the proposed mitigation are included within the Draft EIR, nor any rational why the mitigation is the only feasible option. The commentor states that further mitigation should be included within the Draft EIR for GHG emissions.

The comment does not provide substantial evidence regarding any significant environmental impact. The County as lead agency has elected to base the project's GHG significant criteria on consistency with the State and regional long-term climate goals or strategies, including ARB 2017 scoping plan, 2022 scoping plan update, and RTP/SCS.

As demonstrated in Draft EIR Section 4-8, Greenhouse Gas Emissions, the proposed project would be consistent with most of the applicable scoping plan policies. However, the proposed project's VMT would exceed the VMT per capita target set for Kern COG and reflected in the RTP/SCS. Therefore, the proposed project would not be consistent with the measures related to reducing VMT per capita. In other words, the project's GHG impact is due to the project's significant VMT impact.

Notably, while public agencies may use their discretionary powers granted by laws other than CEQA to mitigate environmental impacts, CEQA does not, expand the powers granted by those other laws. Pub Res C §21004; State CEQA Guidelines §§15040(a-c, e). Thus, the County's exercise of its discretionary powers for environmental protection must be consistent with express or implied limitations on its authority found in other laws. Existing regulations are therefore an effective avenue to implement mitigation. As discussed in Draft EIR Section 4-17, Transportation, feasible mitigation measures to reduce VMT impact were identified. OPR provides a list of potential measures to reduce VMT but gives the lead agency full discretion in the selection of mitigation measures. For an individual development project, VMT mitigations typically require the

development of a Transportation Demand Management (TDM) program. Mitigation Measure MM 4.17-2, reprinted below, would reduce the proposed project's VMT per employee by 5.4 percent. However, since the proposed mitigation is not expected to reduce the proposed project's VMT per employee by more than the 24.5 percent reduction required to meet the County VMT threshold, the proposed project's VMT impact would be significant and unavoidable.

The Draft EIR appropriately provided quantitative evaluation of the effectiveness of the MM in reducing VMT, thus, GHG impacts to the extent required by CEQA. No further response is needed.

MM 4.17-2 Prior to the issuance of construction or building permits, the proposed project shall prepare a Transportation Demand Management Program to reduce project's Vehicle Miles Traveled associated with employee trips. The Transportation Demand Management Program shall include Transportation Demand Management measures that would individually reduce the proposed project's Vehicle Miles Traveled and trips, with the goal of obtaining a Vehicle Miles Traveled reduction to lessen the proposed project's Vehicle Miles Traveled impact. The following Transportation Demand Management measures would be implemented by the proposed project as part of the Transportation Demand Management Program:

1. Alternative-Mode Subsidies and Incentives: Provide subsidization of transit fares, carpool, or electric vanpool for employees of the project site. Provide monetary incentives for alternative-modes of transportation.
2. Travel Behavior Change Program: Provide a website that allows employees to research other modes of transportation for commuting to the site.
3. Promotions and Marketing: Provide marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices with passive educational and promotional materials.
4. Commute Assistance Center: Provide a computer kiosk that allows employees to research other modes of transportation for commuting.
5. Preferential Carpool/Vanpool Parking Spaces: Provide reserved carpool/vanpool spaces closer to the building entrance.
6. Passenger Loading Zones: Provide passenger loading zones for easy access to carpools or vanpools.
7. Bike Share: Implement a bike share to allow people to have on-demand access to a bicycle, as-needed.
8. Bike Parking and Facilities: Include secure bike parking and showers to provide additional end-of-trip bicycle facilities to support safe and comfortable bicycle travel. Provide on-site bicycle repair tools and space to use them to support ongoing use of bicycles for transportation.

10-D: This comment states that further mitigation applied to the maximum-feasible extent should be included in the Draft EIR to justify the significant and unavoidable finding related to GHG

emissions. The commentor states that maximum-feasible mitigation was not demonstrated for the proposed project. The comment states that design and technology specifications can be specified by the County and the Applicant, noting heavy-duty truck and transportation fleets and energy reduction measures through adopting green building features.

The comment does not provide substantial evidence regarding any significant environmental impact. As discussed in C, above, it was determined in the Draft EIR that the proposed project would be consistent with all but one aspect – reducing VMT per capita - of the GHG reduction policies and goals set forth in ARB 2017 scoping plan, 2022 scoping plan update, and RTP/SCS. Further, the Draft EIR considered all feasible mitigation measures to reduce VMT per employee to below County threshold. The commenter suggested the addition of "more green building features"; however, as those would not reduce VMT, the addition of such features would not reduce impacts. Responses to comments need not address a list of general suggestions for mitigating an environmental impact that are not concrete or specific to the project. *Santa Clarita Org. for Planning the Env't v City of Santa Clarita* (2011) 197 CA4th 1042. The commenter did not provide other specific feasible and enforceable mitigations with a nexus to the project's impact. Therefore, no further response is required.

10-E: This comment states that the Draft EIR must include fair-share mitigation for all significant cumulative impacts. The comment states that the GHG emissions for the proposed project would be 426,960 MTCO2e during the project lifespan, from which offset purchases must be made. The comment lists several on-site mitigation strategies, including LEED certification.

The comment does not provide substantial evidence regarding any significant environmental impact. The commenter's suggested mitigation measures are aimed at reducing the project's GHG emissions to net-zero, which is not the significance threshold that the County as lead agency has elected to use. Therefore, the commenter's suggested measures related to sustainable building certification, zero-emission heavy-duty truck fleet, and purchasing clean power, do not have a legal nexus to reduce the project's impact related to VMT per capita and are appropriately rejected as not applicable to reducing the identified impact. Nonetheless, it is notable that the proposed project would be implementing numerous best practices from the Attorney General's Warehouse Projects Best Practices Memorandum, as shown in Section 4.8, Greenhouse Gas Emissions, of the Draft EIR. Further, carbon offset mitigation has questionable effectiveness (*Golden Door Props. v County of San Diego* (2020) 50 Cal.App.5th 467), and the commenter does not provide substantial evidence regarding the effectiveness of purchasing carbon offset.

10-F: This comment is a conclusion to the comment letter, stating impacts related to GHG emissions would not be unavoidable as stated in the Draft EIR. The comment states that the lead agency has not met its burden and the Draft EIR should be amended to reflect all feasible mitigation to the fair-share extent. The commentor requests to be placed on the interest list, and states that the comment is made under Public Resources Code, section 21092.2.

This comment is noted for the record**.** See Response 10- B for clarifications on all feasible mitigation measures and findings. The commentor organization has been added to the notification list for the project.