

CITY OF MANTECA
DEVELOPMENT SERVICES DEPARTMENT



**Yosemite Mixed Use Conversion
(Batched GPAs Site 5) Project**

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

April 2026

Prepared by



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INITIAL STUDY
APRIL 2026

A. PROJECT SUMMARY

1. Project Title: Yosemite Mixed Use Conversion (Batched GPAs Site 5) Project
2. Lead Agency Name and Address: City of Manteca
Development Services Department
1215 West Center Street, Suite 201
Manteca, CA 95337
3. Contact Person and Phone Number: Sol Jobrack
Associate Planner
(209) 456-8574
4. Project Location: Southwest of the West Yosemite Avenue/Airport Way Intersection
Manteca, CA 95337
Assessor's Parcel Numbers (APNs): 241-300-04, -05,
-06, -07, -67, -68, -71, -74, -75, and -76
5. Project Sponsor's Name and Address: City of Manteca
Development Services Department
1215 West Center Street, Suite 201
Manteca, CA 95337
6. Existing Land Use Designations: Commercial Mixed Use (CMU)
Industrial (I)
Medium Density Residential (MDR)
Public/Quasi-Public (PQP)
7. Proposed Land Use Designation: CMU
8. Existing Zoning Designations: Planned Development (PD)
Limited Multiple-Family Dwelling (R2)
Light Industrial (M1)
CMU
9. Proposed Zoning Designation: CMU
10. Required Approvals from Other Public Agencies: San Joaquin Valley Air Pollution
Control District (SJVAPCD)
San Joaquin Council of Governments (SJCOG)
U.S. Army Corps of Engineers (USACE)
Regional Water Quality Control Board (RWQCB)

11. Surrounding Land Uses and Setting:

The approximately 23.08-acre project site, identified by APNs 241-300-04, -05, -06, -07, -67, -68, -71, -74, -75, and -76, is located southwest of the intersection of West Yosemite Avenue and South Airport Way in the City of Manteca, California. The project site currently includes a mix of industrial and commercial uses, as well as single-family residences. Surrounding existing land uses include commercial uses and undeveloped land to the north; commercial uses and single-family residences to the east; agricultural uses to the south; and agricultural uses and the Manteca Wastewater Treatment Plant (WWTP) to the west. The City of Manteca General Plan designates the project site as I, CMU, PQP, and MDR. The site is zoned PD, R2, M1, and CMU.

12. Project Description Summary:

The Yosemite Mixed Use Conversion (Batched GPAs Site 5) Project (proposed project) would include a General Plan Amendment (GPA) to change the General Plan land use designation of the project site from I, CMU, PQP, and MDR to CMU, as well as a rezone from M1, PD, CMU, and R-2 to CMU. Development of the project site is not currently proposed.

13. Status of Native American Consultation Pursuant to Public Resources Code Section 21080.3.1:

In compliance with Assembly Bill (AB) 52 (Public Resources Code [PRC] Section 21080.3.1), and Senate Bill (SB) 18 notification letters were distributed to the Amah Mutsun Tribal Band, Confederated Villages of Lisjan Nation, Muwekma Ohlone Tribe of the San Francisco Bay Area, Northern Valley Yokut / Ohlone Tribe, Tule River Indian Tribe, Wilton Rancheria, and Wuksachi Indian Tribe/Eshom Valley Band on December 29, 2025. Responses were received from the Confederated Villages of Lisjan Nation and Northern Valley Yokut / Ohlone Tribe requesting consultation. The Confederated Villages of Lisjan Nation requested copies of the California Historic Resources Information System (CHRIS) search results and the draft Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the proposed project. Upon receipt of the CHRIS search results and the draft IS/MND, the Confederated Villages of Lisjan Nation concluded consultation. Further requests for consultation by the Northern Valley Yokut / Ohlone Tribe were not received following their initial request, and consultation has since been closed.

B. SOURCES

The following documents are referenced information sources used for the purposes of this IS/MND:

1. CalEPA. *Cortese List Data Resources*. Available at: <https://calepa.ca.gov/sitecleanup/corteselist/>. Accessed January 2026.
2. California Department of Conservation. *Earthquake Zones of Required Investigation*. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>. Accessed December 2025.
3. California Department of Forestry and Fire Protection. *Fire Hazard Severity Zone Viewer*. Available at: <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>. Accessed December 2025.

4. California Department of Transportation. *List of eligible and officially designated State Scenic Highways*. Available at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed February 2026.
5. California Energy Commission. *Renewables Portfolio Standard – RPS*. Available at: <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard>. Accessed February 2026.
6. CalRecycle. *SWIS Facility/Site Activity Details: Foothill Sanitary Landfill. (39-AA-0004)*. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1424?siteID=3097>. Accessed December 2025.
7. CalRecycle. *SWIS Facility/Site Activity Details: Forward Landfill. (39-AA-0015)*. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1434?siteID=3106>. Accessed December 2025.
8. CalRecycle. *SWIS Facility/Site Activity Details: North County Landfill & Recycling Center. (39-AA-0022)*. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1448?siteID=3113>. Accessed December 2025.
9. Central California Information Center. *Records Search File#: 13586L, Project: Yosemite Mixed-Use Conversion*. December 12, 2025.
10. City of Manteca. *2043 Manteca General Plan*. February 2024.
11. City of Manteca. *City of Manteca Active Transportation Plan*. August 2020.
12. City of Manteca. *Manteca General Plan Update Recirculated Draft Environmental Impact Report, SCH No. #2020019010*. November 2022.
13. City of Manteca. *Revised Addendum to the Environmental Impact Report for the Manteca General Plan Update*. February 2024.
14. City of Manteca. *Final Water Master Plan*. February 2024.
15. City of Manteca. *City of Manteca Wastewater Master Plan*. February 2024.
16. Department of Conservation. *California Important Farmland Finder*. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed January 2026.
17. Department of Toxic Substances Control. *Hazardous Waste and Substances Site List (Cortese)*. Available at: <https://www.envirostor.dtsc.ca.gov/public/>. Accessed December 2025.
18. Federal Emergency Management Agency. *Flood Insurance Rate Map 06077C0620F*. Effective October 16, 2009.
19. Fehr & Peers. *Yosemite Avenue Mixed Use Conversion GPA – Transportation Assessment*. January 16, 2026.
20. Governor’s Office of Land Use and Climate Innovation. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December 2018.
21. Native American Heritage Commission. *Re: Yosemite Mixed-Use Conversion Project, San Joaquin County*. December 30, 2025.
22. San Joaquin County. *County of San Joaquin Emergency Operations Plan*. February 17, 2022.
23. San Joaquin Valley Air Pollution Control District. *Small Project Analysis Levels (SPAL)*. November 13, 2020.
24. State Water Resources Control Board. *GeoTracker*. Available at: <https://geotracker.waterboards.ca.gov/map/?myaddress=California&from=header&cqid=8858350455>. Accessed January 2026.
25. U.S. Census Bureau. *QuickFacts: Manteca city, California*. Available at: <https://www.census.gov/quickfacts/fact/table/mantecacitycalifornia/PST045224>. Accessed December 2025.

C. BACKGROUND AND INTRODUCTION

This IS/MND identifies and analyzes the potential environmental impacts of the proposed project. The information and analysis presented in this document is organized in accordance with the order of the California Environmental Quality Act (CEQA) checklist in Appendix G of the CEQA Guidelines. Where the analysis provided in this document identifies potentially significant environmental effects of the project, mitigation measures are prescribed. The mitigation measures prescribed for environmental effects described in this IS/MND would be implemented in conjunction with the proposed project, as required by CEQA. The mitigation measures would be incorporated into the project through conditions of approval. The City would adopt findings and a Mitigation Monitoring and Reporting Program (MMRP) for the project in conjunction with approval of the project.

On July 18, 2023, the City of Manteca adopted the City of Manteca General Plan 2043 (General Plan)¹ and certified the associated Manteca General Plan Update Environmental Impact Report (General Plan EIR).² In February 2024, the City of Manteca certified an Addendum to the General Plan EIR for a targeted amendment to the original General Plan.³ The General Plan EIR is a program EIR, prepared pursuant to Section 15168 of the CEQA Guidelines (Title 14, California Code of Regulations [CCR], Sections 15000 *et seq.*). The General Plan EIR, inclusive of the Addendum, analyzed full implementation of the General Plan and identified measures to mitigate the significant adverse impacts associated with the General Plan.

Consistent with Section 15150 of the CEQA Guidelines, applicable portions of the General Plan and General Plan EIR are incorporated by reference as part of this IS/MND. Project-specific technical reports have been prepared for the proposed project and form the basis of several technical sections of this IS/MND. All technical reports used in the preparation of this IS/MND are included as appendices.

D. PROJECT DESCRIPTION

The following provides a description of the project site location and setting, as well as the project components and the discretionary actions required for the proposed project.

Project Location and Setting

The project site is located southwest of the intersection of West Yosemite Avenue and South Airport Way in the western portion of the City of Manteca, California (see Figure 1). The project site is approximately 23.08 acres in size and is identified by APNs 241-300-04, -05, -06, -07, -67, -68, -71, -74, -75, and -76. The City of Manteca General Plan designates the project site as I, CMU, PQP, and MDR. The site is zoned PD, R2, M1, and CMU.

The project site currently includes a mix of industrial and commercial uses, as well as single-family residences. Surrounding existing land uses include commercial uses and undeveloped land to the north; commercial uses and single-family residences to the east; agricultural uses to the south; and agricultural uses and the Manteca WWTP to the west (see Figure 2).

¹ City of Manteca. *2043 Manteca General Plan*. February 2024.

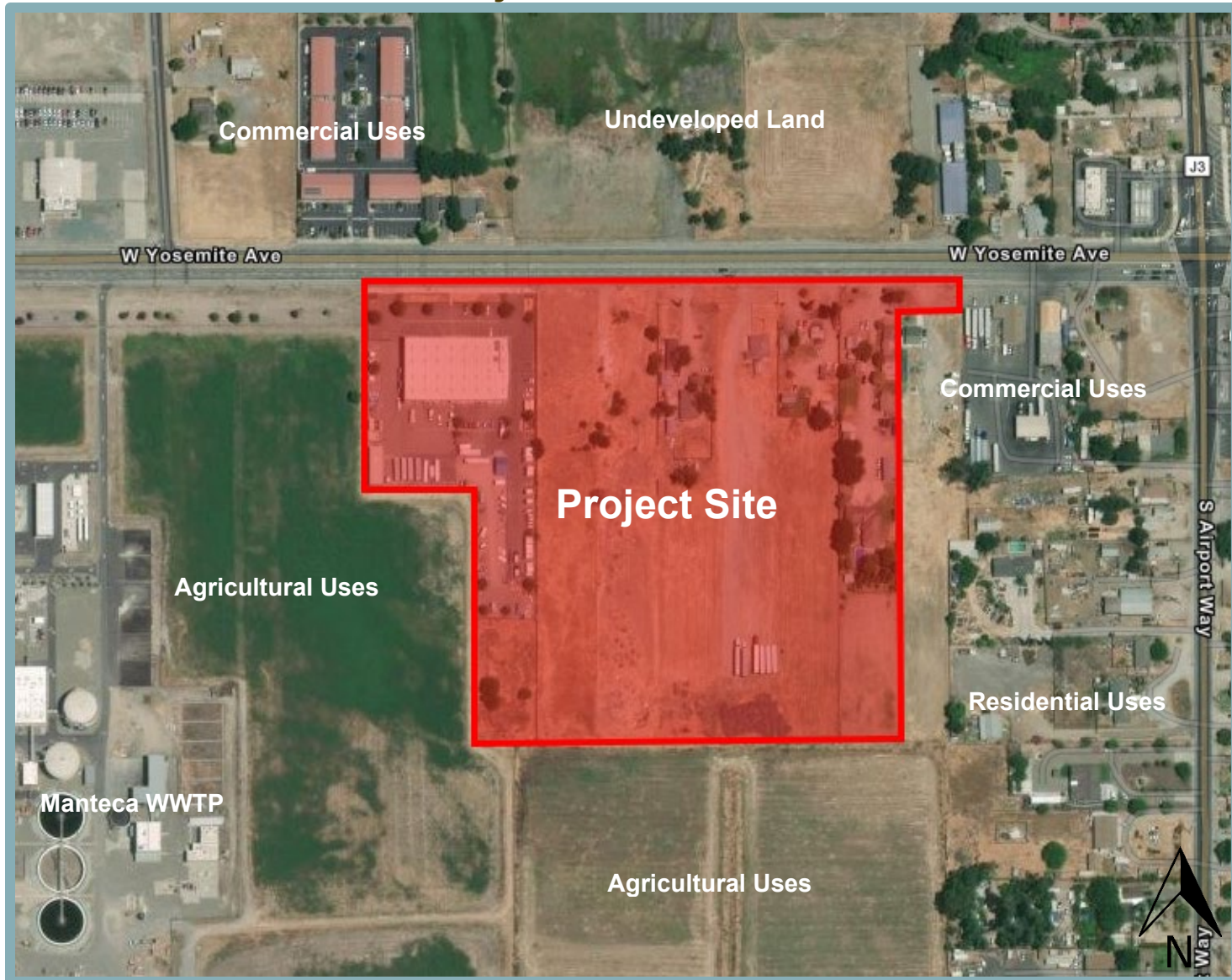
² City of Manteca. *Manteca General Plan Update Recirculated Draft Environmental Impact Report*, SCH No. #2020019010. November 2022.

³ City of Manteca. *Revised Addendum to the Environmental Impact Report for the Manteca General Plan Update*. February 2024.

Figure 1
Regional Project Location



Figure 2
Project Site Boundaries



Project Components

The City of Manteca is seeking to prepare CEQA documentation for five projects to be considered as a Batched GPA. A “Batched GPA” refers to an amendment to the current General Plan that includes multiple changes under a single action consistent with Government Code 65358(b). GPA Batch One would include three capital improvement projects (Sites 1, 2, and 3) and GPA Batch Two would include two non-capital improvement projects (Sites 4 and 5) intended to streamline housing opportunities. Each project included within GPA Batch One and Two would also include an appropriate rezone to reflect each project’s amended General Plan designation.

Potential increases in residential units as a result of the proposed GPAs would balance the loss of any residential land use designations as part of both GPA Batch One and Two.

The GPA analyzed within this IS/MND (Site 5) would include a non-capital improvement project intended to streamline housing opportunities. The potential environmental effects associated with the remaining projects included in the Batched GPA (Sites 1 through 4) will be analyzed in a separate Site-specific Addendum (Batched General Plan Amendment Project [Sites 1-4] Addendum). The project details for Site 5 are discussed further below.

The proposed Site 5 project would include a GPA to change the General Plan land use designation of the project site from I, CMU, PQP, and MDR to CMU, as well as a rezone of the project site from M1, PD, CMU, and R-2 to CMU. As presented in Table 1, proposed GPA and rezone would result in a net increase of CMU land uses, and a net decrease of I, PQP, and MDR land uses within the City’s General Plan planning area.

Table 1 Proposed GPA Land Use Changes (acres)			
Land Use Designation	Existing Conditions	Proposed Conditions	Net Change
Industrial	9.32	--	-9.32
Commercial Mixed Use	1.97	23.08	+21.11
Public/Quasi-Public	7.39	--	-7.39
Medium Density Residential	4.27	--	-4.26

Development of the project site is not currently proposed. Thus, this IS/MND includes a program-level analysis of the environmental impacts associated with the proposed GPA and rezone for the project site, as described above. This IS/MND does not include a project-level analysis of future development for which additional discretionary entitlements (i.e., Site Plan and Design Review, Tentative Subdivision Map, Use Permit, etc.) could potentially be required; rather, such development would be subject to future CEQA analysis when project-level information is available. However, the program-level analysis included herein assumes development of the site with the maximum allowed uses, as permitted by the proposed land use and zoning designations described above. Specifically, under the proposed land use/zoning designations, the maximum development potential of the site is 251,341.2 square feet (sf) of commercial uses and 519 residential units.

Project Approvals

The proposed project would require approval of the following actions by the City of Manteca:

- Adoption of the IS/MND and approval of the MMRP;
- GPA from I, CMU, PQP, and MDR to CMU; and
- Rezone from M1, PD, CMU, and R-2 to CMU.

E. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by the proposed project, involving at least one impact that is “Less-Than-Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forest Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

F. DETERMINATION

On the basis of this initial study:

- I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the Project, nothing further is required.



 Signature

April 9, 2026

 Date

Sol Jobrack, Associate Planner

 Printed Name

City of Manteca

 For

G. ENVIRONMENTAL CHECKLIST

The following Checklist contains the environmental checklist form presented in Appendix G of the CEQA Guidelines. The checklist form is used to describe the impacts of the project. A discussion follows each environmental issue identified in the checklist. Included in each discussion are project-specific mitigation measures recommended, as appropriate, as part of the project. For this checklist, the following designations are used:

Potentially Significant Impact: An impact that could be significant, and for which no mitigation has been identified. If any potentially significant impacts are identified, an EIR must be prepared.

Less Than Significant with Mitigation Incorporated: An impact that requires mitigation to reduce the impact to a less-than-significant level.

Less-Than-Significant Impact: Any impact that would not be considered significant under CEQA relative to existing standards.

No Impact: The project would not have any impact.

I. AESTHETICS.

Would the project:

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

Discussion

a,b. Examples of typical scenic vistas would include mountain ranges, ridgelines, or bodies of water as viewed from a highway, public space, or other area designated for the express purpose of viewing and sightseeing. In general, a project’s impact to a scenic vista would occur if development of the proposed project would substantially change or remove a scenic vista. As noted in the General Plan EIR, while the planning area contains areas and viewsheds with scenic characteristics, such as views of open space and agricultural land, officially designated scenic vista points are not located within the planning area. In addition, according to the California Scenic Highway Mapping System, the project site is located approximately 13.5 miles northeast of the nearest State Scenic Highway, SR 580.⁴ Furthermore, the project site is not visible from SR 580. Thus, the proposed project would not have a substantial adverse effect on a designated scenic vista.

According to the General Plan EIR, new development may result in changes to the skyline throughout the planning area, which may obstruct or interfere with views of visual features surrounding the planning area. However, the project site is currently developed with industrial, residential, and commercial uses, is located within an urban area, and is surrounded by existing development to the north and west. Given that the project site’s existing land use designations assume the site would be developed with commercial, industrial, and residential uses, future development of the site with urban uses, has been generally anticipated by the City. In addition, considering the project site is located in an urbanized area, future development of the project site would serve as an extension of the existing development in the project vicinity. As such, the proposed project would not have a substantial adverse effect on a scenic vista or substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway, and a **less-than-significant** impact would occur.

c. The site is bound by West Yosemite Avenue to the north. Surrounding existing land uses include commercial uses and undeveloped land to the north; commercial uses and single-family residences to the east, agricultural uses to the south; and agricultural uses and the Manteca WWTP to the west. Given the relatively urban nature of the project area, the

⁴ California Department of Transportation. *List of eligible and officially designated State Scenic Highways*. Available at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed February 2026.

relevant threshold for the purposes of the analysis provided below is whether the proposed project would conflict with applicable zoning and other regulations governing scenic quality.

The proposed project does not include any site-specific development plans, designs, or proposals. The proposed project would include a GPA to change the site's land use designations from I, CMU, and MDR to CMU, and a rezone of the site from PD, R2, M1, and CMU to CMU. According to the City's General Plan, the CMU designation allows for a mix of high density residential, employment centers, retail commercial, and professional offices. As discussed above, under the proposed land use/zoning designation, the maximum development potential of the site is 251,341.2 square feet (sf) of commercial uses and 519 residential units.

However, future on-site development facilitated by the proposed project would be subject to the applicable development standards for the CMU zoning district included in Section 17.26.070 of the City's Municipal Code, such as building height, lot area, setbacks, and building design. In addition, future on-site development facilitated by the proposed project would be required to incorporate landscaping throughout the project site in accordance with Chapter 17.48 of the City's Municipal Code. Furthermore, any future on-site development facilitated by the proposed project would be subject to Site Plan and Design Review, pursuant to Section 17.10.060 of the City's Municipal Code, which would allow the City to review all development, signs, buildings, structures, and other facilities associated with future development on-site, and ensure consistency with all applicable design standards. In addition, future on-site development facilitated by the proposed project would be required to comply with all applicable General Plan Policies related to scenic quality, such as Policies CD-1.1 and CD-2.7.

Compliance with the policies and actions established in the General Plan, as well as the design standards included in the Municipal Code would ensure that future on-site development facilitated by the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, a ***less-than-significant*** impact would occur.

- d. As discussed above, the proposed project does not include any specific development plans, designs, or proposals. Therefore, the proposed project would not involve new sources of light and glare within the project site. Although the project site is currently developed with a mix of industrial and commercial uses, as well as single-family residences, future development of the site facilitated by the proposed project could introduce new sources of light and glare beyond what currently exists on-site. However, future development of the project site would be required to comply with all General Plan policies related to light and glare, as well as Section 17.50.060D of the City's Municipal Code, which states that outdoor lighting shall be designed to illuminate at the minimum level necessary for safety and security while avoiding the harsh contrasts in lighting levels between the project site and adjacent properties. In addition, the project would be required to comply with Section 17.50.060C of the City's Municipal Code, which requires the following:

[...] all outdoor lighting shall be constructed with full shielding and/or recessed to reduce light trespass to adjoining properties. Each fixture shall be directed downward and away from adjoining properties and public rights-of-way, so that no light fixture directly illuminates an area outside of the site. Fixtures located higher

than 6 feet above the ground shall have shielding that limits to angle of the cone of direct illumination to 60 degrees or less.

Compliance with the aforementioned standards would ensure that future on-site lighting would be directed downwards and within the project site and would not substantially illuminate adjacent properties. As such, compliance with applicable policies, regulations, and standards would ensure that all new sources of light and glare indirectly facilitated by the proposed project are minimized to the extent feasible. Furthermore, any future on-site development facilitated by the proposed project would be subject to Site Plan and Design Review, as established by Municipal Code Section 17.10.060, which would ensure that potential impacts related to light and glare are evaluated prior to project approval, and if necessary, mitigated to the extent feasible.

Given the general consistency of the proposed project with surrounding development and compliance with City requirements related to lighting, implementation of the proposed project would result in a ***less-than-significant*** impact related to creating a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

II. AGRICULTURE AND FOREST RESOURCES.

Would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘

Discussion

- a,e. According to the California Department of Conservation’s Farmland Mapping and Monitoring Program (FMMP), the project site consists of Rural Residential Land.⁵ Given the FMMP Rural Residential Land designation for the site, future development of the project site facilitated by the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, or otherwise result in the loss of Farmland to non-agricultural use. In addition, while the proposed project includes a GPA and rezone, the City’s General Plan currently designated the site for urban uses. Therefore, **no impact** would occur as a result of the proposed project.
- b. The project site is not under a Williamson Act contract and is not designated or zoned for agricultural uses. Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and **no impact** would occur.
- c,d. The project site is not considered forest land (as defined in PRC Section 12220[g]), timberland (as defined by PRC Section 4526), and is not zoned Timberland Production (as defined by Government Code Section 51104[g]). Therefore, the proposed project would have **no impact** with regard to conversion of forest land or any potential conflict with forest land, timberland, or Timberland Production zoning.

⁵ Department of Conservation. *California Important Farmland Finder*. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed January 2026.

III. AIR QUALITY.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a,b. The City of Manteca, including the project site, is located within the northern portion of the San Joaquin Valley Air Basin (SJVAB) and is within the jurisdictional boundaries of the SJVAPCD. The SJVAB area is currently designated as a non-attainment area for the State and federal ozone, State and federal particulate matter 2.5 microns in diameter (PM_{2.5}), and State particulate matter 10 microns in diameter (PM₁₀) standards. The SJVAB is designated attainment or unclassified for all other ambient air quality standards (AAQS) should be noted that although the U.S. Environmental Protection Agency (EPA) revoked their 1-hour ozone standard in 2005, in May of 2016, the EPA proposed findings that the SJVAB was in attainment of the 1-hour ozone standard.

In compliance with regulations, due to the non-attainment designations of the area, the SJVAPCD periodically prepares and updates air quality plans that provide emission reduction strategies to achieve attainment of the AAQS, including control strategies to reduce air pollutant emissions through regulations, incentive programs, public education, and partnerships with other agencies. The most recent ozone plan is the 2016 Ozone Plan for the 2008 8-Hour Ozone Standard, which was adopted by the SJVAPCD on June 16, 2016. The California Air Resources Board (CARB) subsequently conducted a public meeting to consider approval of the 2016 Ozone Plan for the 2008 8-Hour Ozone Standard, and approved the plan on July 21, 2016. Additionally, the most recent federal attainment plan for PM is the 2016 Plan for the 1997 PM_{2.5} Standard, which was approved by the District Governing Board on April 16, 2015.

The aforementioned air quality plans contain mobile source controls, stationary source controls, and transportation control measures (TCMs) to be implemented in the region to attain the State and federal standards within the SJVAB. Adopted SJVAPCD rules and regulations, as well as the thresholds of significance, have been developed with the intent to ensure continued attainment of AAQS, or to work towards attainment of AAQS for which the area is currently designated non-attainment, consistent with applicable air quality plans. The SJVAPCD has established broad significance thresholds associated with the construction and operation emissions for various criteria pollutants including ozone precursors such as reactive organic gases (ROG) and oxides of nitrogen (NO_x), as well as for PM₁₀, PM_{2.5}, sulfur oxide (SO_x), and carbon monoxide (CO) expressed in tons per year. Thus, by exceeding the SJVAPCD's mass emission thresholds for operational emissions of ROG, NO_x, PM₁₀, PM_{2.5}, SO_x, or CO a project would be considered to conflict with or obstruct implementation of the SJVAPCD's air quality planning efforts. The SJVAPCD's adopted thresholds of significance for criteria pollutant emissions are

presented in Table 2. If the proposed project’s emissions exceed the applicable thresholds of significance presented in the table, the project could violate an air quality standard, contribute to an existing or projected air quality violation or conflict with or obstruct implementation of the applicable air quality plans.

Table 2		
SJVAPCD Criteria Pollutant Thresholds of Significance		
Pollutant	Construction Emissions (tons/yr)	Operational Emissions (tons/yr)
ROG	10	10
NO _x	10	10
CO	100	100
SO _x	27	27
PM ₁₀	15	15
PM _{2.5}	15	15

Source: SJVAPCD, March 19, 2015.

To streamline the process of assessing significance of criteria pollutant emissions from common projects, the SJVAPCD has developed the screening tool, Small Project Analysis Level (SPAL). Using project type and size, the SJVAPCD has pre-quantified mass emissions and determined a size below which mass emissions from a project would be reasonably considered not to exceed the thresholds of significance presented above for criteria pollutants. Projects less than the sizes identified by the SJVAPCD are deemed to have a less-than-significant impact on air quality due to criteria pollutant mass emissions and are excluded from quantifying criteria pollutant emissions for CEQA purposes.

The proposed project does not include any site-specific development plans, designs, or proposals. However, future development of the site under the City’s CMU designation could include a mix of high density residential, employment centers, retail commercial, and professional offices. As discussed above, under the proposed land use/zoning designation, the maximum development potential of the site is 251,341.2 sf of commercial uses and 519 residential units. The SPAL for the Strip Mall⁶ land use is less than 49,600 sf and the SPAL for the Mid-Rise Apartment land use is less than 225 dwelling units.⁷ Thus, future development of the site facilitated by the proposed project would exceed the SPAL, and further analysis is required.

Construction and operational emissions associated with future development of the site facilitated by the proposed project were quantified using the California Emissions Estimator Model (CalEEMod) software version 2022.1.1.37 – a statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify air quality emissions, including GHG emissions, from land use projects. The model applies inherent default values for various land uses, including construction data, trip generation rates, vehicle mix, trip length, average speed, compliance with the California Building Standards Code (CBSC), etc. Where project-specific information is available, such information should be applied in the model. Accordingly, the modeling prepared for future on-site development facilitated by the proposed project assumes the following project and/or site-specific information:

⁶ The Strip Mall land use within the SJVAPCD SPAL is the most representative land use for the allowable commercial uses in the CMU designation, as it encompasses a variety of different commercial land use types, and because specific commercial uses are not currently proposed on-site.

⁷ San Joaquin Valley Air Pollution Control District. *Small Project Analysis Levels (SPAL)*. November 13, 2020.

- Construction would commence in June 2026 and occur over an approximately one year and nine month period;⁸
- Future on-site development facilitated by the proposed project would be operational by 2028;⁹
- While it is unknown if demolition is occurring on-site, to be conservative, approximately 3,523 sf of building materials were estimated to be demolished and exported during demolition;¹⁰ and
- The trip rates have been updated to be consistent with Transportation Assessment¹¹ provided for the proposed project.

The estimated emissions associated with construction and operation of the future development of the site facilitated by the proposed project are presented and discussed in further detail below. A discussion of the contribution to cumulative air quality conditions by the future development of the site facilitated by the proposed project is provided below as well. All CalEEMod results are included as Appendix A to this IS/MND.

It should be noted that all development within the SJVAPCD, including the future development of the site facilitated by the proposed project, is required to comply with all applicable SJVAPCD rules and regulations, including, but not limited to, Regulation VIII (Fugitive PM₁₀ Prohibition), Rule 4101 (Visible Emissions), Rule 4601 (Architectural Coatings), Rule 4641 (Cutback Slow Cure, Emulsified Asphalt, Paving and Maintenance Operations), and Rule 4102 (Nuisance). Compliance with the aforementioned regulations would help to reduce criteria pollutant emissions associated with the construction activity discussed below.

Construction Emissions

According to the CalEEMod results, future on-site development facilitated by the proposed project would result in maximum construction emissions as shown in Table 3 below. As shown in the table, construction emissions from future on-site development facilitated by the proposed project would be below the applicable thresholds of significance for all relevant criteria pollutants.

Table 3 Maximum Construction Emissions (tons/yr)						
	ROG	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
Proposed Project Emissions	1.91	1.94	4.55	0.006	0.74	0.21
SJVAPCD Significance Threshold	10	10	100	27	15	15
Exceeds Threshold?	NO	NO	NO	NO	NO	NO
<i>Source: CalEEMod, February 2026 (see Appendix A).</i>						

⁸ The construction timing for the future development facilitated by the proposed project is unknown; however, the construction timing included within the modeling is conservative, as construction fleets and electricity generation are becoming more efficient over time due to state regulations; thus, modeling construction at an earlier start date provides a more conservative analysis.

⁹ Similar to construction timing, assuming an operational year of 2028 is conservative, as electricity generation is becoming more efficient over time and state regulations requiring sustainable development are becoming more stringent; thus, modeling an earlier operational year provides a more conservative analysis.

¹⁰ In order to provide a conservative, worst case emissions scenario when modeling the maximum development potential of the site, the demolition of all existing buildings on-site was assumed to occur.

¹¹ Fehr & Peers. *Yosemite Avenue Mixed Use Conversion GPA – Transportation Assessment*. January 16, 2026.

Operational Emissions

According to the CalEEMod results, the operations of future on-site development facilitated by the proposed project would result in maximum criteria air pollutant emissions as shown in Table 4. As shown in the table, the operational emissions of future on-site development facilitated by the proposed project would be below the applicable thresholds of significance for all pollutants except for ROG. Thus, because future on-site development facilitated by the proposed project would result in emissions over the thresholds of significance for ROG, the proposed project could be considered to result in a potentially significant impact to air quality.

Pollutant	Project Emissions	Threshold of Significance	Exceeds Threshold?
ROG	10.59	10	YES
NO _x	6.61	10	NO
CO	53.59	100	NO
SO _x	0.13	27	NO
PM ₁₀	11.12	15	NO
PM _{2.5}	3.42	15	NO

Source: CalEEMod, February 2026 (see Appendix A).

Cumulative Emissions

A cumulative impact analysis considers a project over time in conjunction with other past, present, and reasonably foreseeable future projects whose impacts might compound those of the project being assessed. By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development. Future attainment of ambient air quality standards is a function of successful implementation of SJVAPCD attainment plans. Consequently, the SJVAPCD's application of thresholds of significance for criteria pollutants is relevant to the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality.

A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project would comply with the requirements in a previously approved plan or mitigation program, including, but not limited to an air quality attainment or maintenance plan that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area in which the project is located (California Code of Regulations [CCR] Section 15064[h][1]). Thus, as stated in Section 7.14 of the SJVAPCD *Guidance for Assessing and Mitigating Air Quality Impacts*, if project-specific emissions would exceed the thresholds of significance for criteria pollutants, the project would be expected to result in a cumulatively considerable net increase of any criteria pollutant for which the area is in non-attainment under applicable ambient air quality standards. As further discussed in Section 8.8 of the SJVAPCD *Guidance for Assessing and Mitigating Air Quality Impacts*, the SJVAPCD would consider projects consistent with the following to result in a less-than-cumulatively-significant impact related to air quality:

- SJVAPCD attainment plans;
- SJVAPCD rules and regulations;
- State air quality regulations;

- Project emissions below SJVAPCD thresholds of significance for criteria pollutants, localized CO, and toxic air contaminants (TACs); and
- Project emissions below AAQS.

As presented above, future on-site development facilitated by the proposed project would result in construction-related emissions below all applicable thresholds of significance, and operational emissions below all applicable thresholds of significance, with the exception of ROG. However, as discussed in further detail below, all future on-site development facilitated by the proposed project would be required to implement Mitigation Measure III-1 to reduce ROG emissions to acceptable levels. In addition, as discussed in further detail below, future on-site development facilitated by the proposed project would be below the applicable thresholds of significance related to localized CO and TAC concentrations. Therefore, future on-site development facilitated by the proposed project would not be considered to result in a cumulatively considerable net increase in any criteria pollutant for which the area is under nonattainment for a federal or State AAQS (i.e., ozone and PM). Consequently, in accordance with SJVAPCD guidance, because the proposed project would result in emissions less than the thresholds of significance, the proposed project would correspondingly be considered to result in a less-than-significant cumulative impact to air quality.

Conclusion

Based on the above, future on-site development facilitated by the proposed project would not exceed the applicable thresholds of significance for air pollutant emissions during construction. However, operations of future on-site development facilitated by the proposed project would result in emissions that would exceed the threshold for operational ROG. Therefore, the proposed project could be considered to conflict with or obstruct implementation of the applicable air quality plans, or violate an air quality standard or contribute substantially to an existing or projected air quality violation, and a **potentially significant** impact could result.

Mitigation Measure(s)

Implementation of Mitigation Measure III-1 would reduce the operational area source emissions associated with buildout of future on-site development facilitated by the proposed project through requiring electric hearths on-site and the use of zero-VOC paints finishes, adhesives, and cleaning supplies as shown in Table 5. As shown in the table, with the implementation of Mitigation Measure III-1, the operational ROG emissions of future on-site development facilitated by the proposed project would be below the applicable thresholds of significance.

Pollutant	Project Emissions	Threshold of Significance	Exceeds Threshold?
ROG	9.84	10	NO
NO _x	6.35	10	NO
CO	48.71	100	NO
SO _x	0.12	27	NO
PM ₁₀	10.42	15	NO
PM _{2.5}	2.74	15	NO

Source: CalEEMod, February 2026 (see Appendix A).

Implementation of the following mitigation measure would ensure that operational emissions of ROG would not exceed SJVAPCD thresholds of significance. Consequently, with implementation of the following mitigation measure, the proposed project would result in a *less-than-significant* impact.

III-1. The project applicant shall ensure that only electric hearths shall be allowed within any proposed on-site residences and that only zero-VOC paints, finishes, adhesives, and cleaning supplies shall be used during construction and operations of any future on-site development.

Alternatively, future project applicants may provide the City of Manteca Development Services Department with proof of implementation of alternative mitigation measures, that show a reduction in ROG emissions such that emission are below the applicable SJVAPCD thresholds of significance.

The aforementioned requirements shall be noted on all future development proposals and the informational sheet filed with any final subdivision map(s) and shall be provided to the City of Manteca Development Services Department for review and approval prior to approval of improvement plans for each future development proposal.

- c. Some land uses are considered more sensitive to air pollution than others, due to the types of population groups or activities involved. Heightened sensitivity may be caused by preexisting health problems, proximity to the emissions source, and/or duration of exposure to air pollutants. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, childcare centers, playgrounds, retirement homes, convalescent homes, hospitals, and medical clinics. The nearest sensitive receptors to the project site are the residences located approximately 190 feet east of the project site.

The major pollutant concentrations of concern are localized CO emissions and TAC emissions, which are addressed in further detail below.

Localized CO Emissions

Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. Implementation of the proposed project would involve a General Plan amendment and rezone, and does not currently include any proposed development. However, future on-site development facilitated by the proposed project would increase traffic volumes on streets near the project site; therefore, the future development of the project site could be expected to increase local CO concentrations. Concentrations of CO approaching the ambient air quality standards are only expected where background levels are high, and traffic volumes and congestion levels are high. In accordance with the State CO Protocol, the SJVAPCD has established preliminary screening criteria for determining whether the effect that a project would have on any given intersection would cause a potential CO hotspot. If either of the following is true for the proposed project, further CO analysis would be required:

- A traffic study for the project indicates that the Level of Service (LOS) on one or more streets or at one or more intersections in the project vicinity would be

- reduced to LOS E or F; or
- A traffic study indicates that the project would substantially worsen (i.e., increase delay by more than five percent) an already existing LOS F on one or more streets or at more or more intersections in the project vicinity.

However, as discussed in Section XVII, Transportation, of this IS/MND, the State Legislature passed SB 743 with the intention of ultimately doing away with LOS in most instances as a basis for environmental analysis under CEQA. Therefore, for the purposes of assessing localized CO emission impacts associated with the proposed project, the thresholds of significance used by the nearby air districts, Placer County Air Pollution Control District (PCAPCD) and Sacramento Metropolitan Air Quality Management District (SMAQMD) were applied to the proposed project. According to the PCAPCD screening levels, a project could result in a significant impact if the project would result in CO emissions from vehicle operations in excess of 550 lbs/day. The maximum unmitigated daily construction and operational emissions of CO generated by future on-site development facilitated by the proposed project are provided in Table 6 below. As shown in Table 6, CO emissions associated with future on-site development facilitated by the proposed project would be below the PCAPCD’s 550 lbs/day screening level.

Table 6	
Maximum Unmitigated Emissions of CO (lbs/day)	
Project Phase	CO Emissions
Construction	39.50
Operations	437.73
<i>Source: CalEEMod, February 2026 (see Appendix A).</i>	

Additionally, per the SMAQMD Guide, emissions of CO are generally of less concern than other criteria pollutants, as operational activities are not likely to generate substantial quantities of CO, and the SVAB has been in attainment for CO for multiple years. Given that the SJVAPCD is directly bounded by SMAQMD, emissions of CO can generally be assumed to be of less concern than other criteria pollutants within the SJVAPCD as well.

Based on the above, the proposed project would result in a less-than-significant impact related to localized CO emissions concentrations and would not expose sensitive receptors to substantial concentrations of localized CO.

TAC Emissions

Another category of environmental concern is TACs. The CARB’s *Air Quality and Land Use Handbook: A Community Health Perspective* (Handbook) provides recommended setback distances for sensitive land uses from major sources of TACs, including, but not limited to, freeways and high traffic roads, distribution centers, and rail yards. The CARB has identified diesel particulate matter (DPM) from diesel-fueled engines as a TAC; thus, high volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic are identified as having the highest associated health risks from DPM. Health risks from TACs are a function of both the concentration of emissions and the duration of exposure. Health-related risks associated with DPM in particular are primarily associated with long-term exposure and associated risk of contracting cancer. The proposed project would include a GPA and rezone to designate and zone the project site as CMU. The City’s CMU designation would allow for the development of a variety of commercial and residential land uses on-site, which are not considered major sources of TACs. Thus, while development is not currently proposed, future on-site development

facilitated by the proposed project would not generate any substantial pollutant concentrations during operations.

Short-term, construction-related activities could result in the generation of TACs, specifically DPM, from on-road haul trucks and off-road equipment exhaust emissions. However, construction is temporary and occurs over a relatively short duration in comparison to the operational lifetime of a project. Construction equipment would operate intermittently throughout the course of a day, would be restricted to daytime hours per the City's Noise Ordinance, and would likely only occur over portions of the improvement area at a time. In addition, all construction equipment and operation thereof would be regulated per the In-Use Off-Road Diesel Vehicle Regulation. Project construction would also be required to comply with all applicable SJVAPCD rules and regulations, particularly associated with permitting of air pollutant sources. Because health risks associated with TACs are a function of both the concentration of emissions and the duration of exposure, where the higher the concentration and/or the longer the period of time that a sensitive receptor is exposed to would correlate to a higher health risk, considering the short-term nature of construction activities, as well as the regulated and intermittent nature of the operation of construction equipment, the likelihood that any one sensitive receptor would be exposed to high concentrations of DPM for any extended period of time would be low.

Conclusion

Based on the above, the proposed project would not cause or be exposed to substantial pollutant concentrations, including localized CO or TACs, and impacts related to such would be *less than significant*.

- d. Emissions such as those leading to odors have the potential to adversely affect sensitive receptors within the project area. Pollutants of principal concern include emissions leading to odors, emission of dust, or emissions considered to constitute air pollutants. Air pollutants have been discussed in section "a" through "c" above. Therefore, the following discussion focuses on emissions of odors and dust.

Odors

Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The presence of an odor impact is dependent on several variables including: the nature of the odor source; the frequency of odor generation; the intensity of odor; the distance of odor source to sensitive receptors; wind direction; and sensitivity of the receptor.

Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, it is difficult to quantitatively determine the presence of a significant odor impact. Typical odor-generating land uses include, but are not limited to, WWTPs, landfills, and composting facilities. The proposed project would include a GPA and rezone to designate and zone the project site as CMU. The City's CMU designation would allow for the development of a variety of commercial and residential land uses on-site, which are not considered major sources of TACs. Thus, while development is not currently proposed, future on-site development facilitated by the proposed project would not introduce any of the aforementioned land uses.

Additionally, the Manteca Wastewater Treatment Plant (WWTP), which is a land use type associated with the potential to generate odors, is located approximately 400 feet to the southwest of the project site. However, existing CEQA case law dictates that analysis of existing environmental conditions must be limited to the effects of the proposed project on the environment.¹² Thus, impacts of the existing WWTP on the proposed project are outside the purview of CEQA.

Construction activities often include diesel fueled equipment and heavy-duty trucks, which could create odors associated with diesel fumes that may be considered objectionable. However, construction activities would be temporary, and operation of construction equipment would be restricted to the hours of 7:00 AM to 7:00 PM, per Section 17.58.050(E)(1) of the City's Municipal Code. Accordingly, substantial objectionable odors would not be expected to occur during future on-site construction activities.

Nonetheless, the future on-site development facilitated by the proposed project would be subject to the SJVAPCD's Rule 4102, which allows members of the public to submit complaints regarding odor. Thus, although not anticipated, if odor complaints are made after future on-site development facilitated by the proposed project is developed, the SJVAPCD would ensure that such odors are addressed, and any potential odor effects reduced to less than significant.

Dust

During construction, future on-site development facilitated by the proposed project would be required to comply with all applicable SJVAPCD rules and regulations regarding fugitive dust, including Regulation VIII. Pursuant to the provisions of Regulation VIII, for projects in which construction-related activities would disturb greater than one acre of land, the SJVAPCD requires preparation of a Dust Control Plan or Construction Notification form before issuance of the first grading permit. Future on-site development facilitated by the proposed project would be subject to this regulation, and submittal of the Dust Control Plan or Construction Notification would be ensured by the City as a condition of project approval for all future on-site development.

Following construction, vehicles operating within the project site would be limited to paved areas of the site, and non-paved areas would be landscaped. Thus, future on-site operations would not include sources of dust that could adversely affect a substantial number of people.

Conclusion

For the reasons discussed above, the proposed project would not result in emissions, such as those leading to odors and/or dust, that would adversely affect a substantial number of people, and a ***less-than-significant*** impact would occur.

¹² See *Ballona Wetlands Land Trust v. City of Los Angeles*, [2011] 201 Cal. App. 4th 455, 473; *California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 377-378.

IV. BIOLOGICAL RESOURCES.

Would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. 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 wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a. Special-status species include those plant and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the federal and State Endangered Species Acts. Both acts afford protection to listed and proposed species. In addition, California Department of Fish and Wildlife (CDFW) Species of Special Concern, which are species that face extirpation in California if current population and habitat trends continue, U.S. Fish and Wildlife Service (USFWS) Birds of Conservation Concern, sensitive species included in USFWS Recovery Plans, and CDFW special-status invertebrates are all considered special-status species. Although CDFW Species of Special Concern generally do not have special legal status, they are given special consideration under CEQA. In addition to regulations for special-status species, most birds in the U.S., including non-status species, are protected by the Migratory Bird Treaty Act (MBTA) of 1918. Under the MBTA, destroying active nests, eggs, and young is illegal. In addition, plant species on California Native Plant Society (CNPS) Lists 1 and 2 are considered special-status plant species and are protected under CEQA.

The project site is currently developed with a mix of industrial and commercial uses, as well as single-family residences, and the proposed project does not include any site-specific development plans, designs, or proposals at this time. Based on aerial imagery of the site, vegetation indicative of potential wetlands may be present throughout the project site. However, site-specific surveys and wetland delineations have not been conducted to confirm the presence of any potential on-site wetlands. Any future development within the

project site would be required to be consistent with all applicable policies, regulations, and standards related to the preservation of biological resources, including those set forth in the City's General Plan and Municipal Code, as well as those required by the federal government and the State. In addition, the project site is located within the boundaries of the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP), which is intended to provide an effective framework to protect natural resources in San Joaquin County, including special-status species.

In order to determine the likelihood for special-status species to occur within the project site, a search of the California Natural Diversity Database (CNDDDB) was conducted for the quadrangle that includes the project site and the eight quadrangles surrounding the project site. The intent of the database review was to identify documented occurrences of special-status species in the vicinity of the project site, to determine their locations relative to the project site, and to evaluate whether the site meets the habitat requirements of such species. Based on the results of the CNDDDB search, several special-status plant and wildlife species are known to occur within the project region. However, the majority of species are not expected to occur on-site due to the lack of suitable habitat. The potential for species covered by the SJMSCP and other special-status species to occur on the project site is discussed in further detail below.

Special-Status Plants

Special-status plants generally occur in relatively undisturbed areas within vegetation communities such as vernal pools, marshes and swamps, chenopod scrub, seasonal wetlands, riparian scrub, chaparral, alkali playa, dunes, and areas with unusual soil characteristics, such as the serpentine soils. While the CNDDDB search identified a total of 20 regionally occurring special-status plant species that are known to occur within the project region, documented occurrences of a special-status plant species were not identified within the City of Manteca. In addition, given that the project site is currently developed with a mix of industrial and commercial uses, as well as single-family residences, the project site has been subject to previous disturbance, including previous grading and ongoing landscaping maintenance. However, as discussed above, vegetation indicative of potential wetlands may be present throughout the project site, and site-specific surveys and wetland delineations have not been conducted to confirm the presence of any potential on-site wetlands. In addition, given that the proposed project does not include site-specific development plans, designs, or proposals at this time, potential disturbance areas on-site are currently unknown. Therefore, prior to any ground disturbance associated with future development on-site, special-status surveys would be required to confirm the presence or absence of special-status plant species within the project site. Without the completion of such surveys, future on-site development facilitated by the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on special-status plant species.

Special-Status Wildlife

The CNDDDB search conducted for the project site shows the project site as being located within five miles of the potential habitat area of the western burrowing owl, tricolored blackbird, Swainson's hawk, white-tailed kite, western yellow-bellied cuckoo, yellow-headed blackbird, least Bell's vireo, merlin, loggerheaded shrike, song sparrow, California black rail, California tiger salamander, foothill yellow-legged frog, California red-legged frog, northwestern pond turtle, western spadefoot, San Joaquin coachwhip, pallid bat, Townsend's big-eared bat, western mastiff bat, San Joaquin kit fox, riparian brush rabbit,

riparian woodrat, American badger, coast horned lizard, giant garter snake, California glossy snake, Crotch's bumblebee, western bumblebee, valley elderberry longhorn beetle (VELB), conservancy fairy shrimp, vernal pool fairy shrimp, vernal pool tadpole shrimp, green sturgeon, hardhead, steelhead, delta smelt, and longfin smelt.

With the exception of yellow-headed blackbird, least Bell's vireo, song sparrow, pallid bat, California glossy snake, Crotch's bumblebee, western bumblebee, hardhead, and steelhead, all of the aforementioned special-status species are covered under the SJMSCP. However, the project area does not contain, nor is it adjacent to, suitable aquatic habitat for California black rail, north western pond turtle, green sturgeon, hardhead, steelhead, delta smelt, and longfin smelt.

Furthermore, as discussed above, the project site is currently developed with a mix of industrial and commercial uses, as well as single-family residences and has been subject to previous disturbance, including previous grading and ongoing landscaping maintenance, which discourages wildlife habitation. Thus, suitable habitat for a majority of special-status wildlife species known to occur in the vicinity is not anticipated to occur within the site. Specifically, adequate foraging and nesting habitats for Crotch's bumblebee and western bumblebee, including open grassland, scrubs, and meadows are not present within the project site.

Nonetheless, 12 special-status species: California tiger salamander, western spadefoot, giant garter snake, conservancy fairy shrimp, vernal pool fairy shrimp, vernal pool tadpole shrimp, pallid bat, Townsend's big-eared bat, western mastiff bat, Swainson's hawk, tricolored blackbird, and western burrowing owl, as well as nesting raptors and migratory birds, have the potential to occur on the project site and warrant further discussion.

California Tiger Salamander

California tiger salamander is listed as threatened pursuant to the Federal Endangered Species Act (FESA) and is a SJMSCP covered species. California tiger salamanders occur in grasslands and open oak woodlands that provide suitable over summering and/or breeding habitats. California tiger salamanders spend the majority of their lives underground. The species typically only emerge from their subterranean refugia for a few nights each year during the rainy season to migrate to breeding ponds. Adult California tiger salamanders have been observed up to 1.3 miles from breeding ponds. During the spring, summer, and fall months, most known populations of the California tiger salamander predominately use California ground squirrel burrows as over-summering habitat. Other secondary subterranean refugia, or primary refugia where California ground squirrels are absent, likely include Botta's pocket gopher burrows, deep fissures in desiccated clay soils, and debris piles (e.g., downed wood and rock piles). Stock ponds, seasonal wetlands, and deep vernal pools typically provide most of the breeding habitat used by California tiger salamander. In such locations, California tiger salamander attach their eggs to rooted, emergent vegetation, and other stable filamentous objects in the water column. Occasionally California tiger salamanders are found breeding in slow-moving, streams or ditches. Ditches and/or streams that are subject to rapid flows, even if only on occasion, typically will not support or sustain California tiger salamander egg attachment through hatching, and thus, are not usually used successfully by California tiger salamander for breeding. Similarly, streams and/or ditches that support predators of California tiger salamander or their eggs and larvae such as fish, bullfrogs, red swamp crayfish, or signal crayfish, almost never constitute suitable breeding habitat. The CNDDB

search returned seven records of California tiger salamander occurrences within the project region. The closest known CNDDDB record for the species is located 1.15-miles southwest of the project site.

As discussed above, vegetation indicative of potential wetlands may be present throughout the project site. Because potential on-site wetlands, including vernal pools and seasonal wetlands, could represent suitable habitat for the species, California tiger salamander has the potential to occur within the project site. Therefore, future on-site development would be required to comply with the Incidental Take Minimization Measures (ITMMs) for California tiger salamander as established by Sections 5.2.4.5 and 5.2.4.6 of the SJMSCP. The ITMMs for California tiger salamander would require preconstruction surveys be conducted according to the current protocol approved by the SJMSCP technical advisory committee and applicable permitting agencies, as well as implementation of measures to minimize impacts to breeding, feeding, and sheltering behaviors of California tiger salamander, including retention of existing breeding habitat and dewatering of existing habitat prior to commencement of construction activities.

Given that the proposed project does not include site-specific development plans, designs, or proposals at this time, potential disturbance areas on-site are currently unknown. Thus, future construction activities such as clearing, grading, and other ground disturbing activities could result in the loss of wetland habitat as well as injury or mortality of California tiger salamander. As such, without compliance with the SJMSCP, implementation of the proposed project could result in adverse effects to California tiger salamander.

Western Spadefoot

The western spadefoot is proposed for federal listing and is a CDFW Species of Special Concern. In addition, western spadefoot is a SJMSCP covered species. The amphibian is a nocturnal animal that forages in grassland, open chaparral, and pine-oak woodlands for a variety of invertebrates, such as insects and worms. Western spadefoot breeds from January through May in a variety of temporary wetlands, including creeks, pools in intermittent drainages, vernal pools, and seasonal wetlands, and other fish-free water features. The tadpoles develop over three to 11 weeks and must complete their metamorphosis before the temporary pools dry. Post-metamorphic juveniles feed and then immediately seek underground refugia. Following metamorphosis, adults are largely terrestrial in nature and will burrow into sandy or gravelly soils utilizing the "spades" on their hind feet. The majority of an adult's life is spent in underground burrows. The CNDDDB search returned four records of western spadefoot occurrences within the project region.

As discussed above, vegetation indicative of potential wetlands may be present throughout the project site. Because potential on-site wetlands, including vernal pools and seasonal wetlands, could represent suitable habitat for the species, western spadefoot has the potential to occur within the project site. Therefore, future on-site development would be required to comply with the Incidental Take Minimization Measures (ITMMs) for western spadefoot as established by Sections 5.2.4.5 and 5.2.4.6 of the SJMSCP. The ITMMs for western spadefoot would require preconstruction surveys be conducted according to the current protocol approved by the SJMSCP technical advisory committee and applicable permitting agencies, as well as implementation of measures to minimize impacts to breeding, feeding, and sheltering behaviors of western spadefoot, including retention of existing breeding habitat and dewatering of existing habitat prior to commencement of construction activities.

Given that the proposed project does not include site-specific development plans, designs, or proposals at this time, potential disturbance areas on-site are currently unknown. Thus, future construction activities such as clearing, grading, and other ground disturbing activities could result in the loss of wetland habitat as well as injury or mortality of western spadefoot. As such, without compliance with the SJMSCP, implementation of the proposed project could result in adverse effects to western spadefoot.

Giant Garter Snake

The giant garter snake is listed as threatened pursuant to FESA and under the California Endangered Species Act (CESA), and is a SJMSCP covered species. Giant garter snake is endemic to the San Joaquin and Sacramento Valleys and inhabits agricultural wetlands and other waterways such as irrigation and drainage canals, sloughs, ponds, small lakes, low-gradient streams, and adjacent uplands. Giant garter snake requires adequate water during its active season (May through October) to provide food and cover, emergent, herbaceous wetland vegetation for foraging and cover, grassy banks and openings in waterside vegetation for basking, and higher elevation uplands for cover and refuge from flood waters during its dormant season (winter). The species inhabits small mammal burrows and other soil crevices with sunny exposure along south and west-facing slopes, above prevailing flood elevations when dormant. Giant garter snake is primarily found in marshes, sloughs, and slow-moving creeks. The CNDDDB search returned three records of giant garter snake occurrences within the project region.

As discussed above, vegetation indicative of potential wetlands may be present throughout the project site. Because potential on-site wetlands, including vernal pools and seasonal wetlands, could represent suitable habitat for the species, giant garter snake has the potential to occur within the project site. Therefore, future on-site development would be required to comply with the ITMM for giant garter snake as established by Section 5.2.4.8 of the SJMSCP. The ITMM for giant garter snake requires that preconstruction surveys be conducted prior to ground disturbance and within 24 hours of the commencement of ground disturbing activities, and that potential giant garter snake habitat be adequately avoided.

Given that the proposed project does not include site-specific development plans, designs, or proposals at this time, potential disturbance areas on-site are currently unknown. Thus, future construction activities such as clearing, grading, and other ground disturbing activities could result in the loss of wetland habitat as well as injury or mortality of giant garter snake. As such, without compliance with the SJMSCP, implementation of the proposed project could result in adverse effects to giant garter snake.

Vernal Pool Invertebrates

Vernal pool fairy shrimp is listed as threatened pursuant to FESA. In addition, vernal pool tadpole shrimp and conservancy fairy shrimp are listed as endangered pursuant to FESA. Vernal pool fairy shrimp, vernal pool tadpole shrimp, and conservancy fairy shrimp are also all SJMSCP covered species. The CNDDDB search returned two records for vernal pool fairy shrimp, three records for vernal pool tadpole shrimp, and one record for conservancy fairy shrimp within the project region.

As discussed above, vegetation indicative of potential wetlands may be present throughout the project site. Because potential on-site wetlands, including vernal pools and seasonal wetlands, could represent suitable habitat for the species, vernal pool

invertebrates could have the potential to occur within the project site. Therefore, future on-site development would be required to comply with the ITMM for vernal pool invertebrates as established by Section 5.2.4.4 of the SJMSCP. The ITMM for vernal pool invertebrates requires that preconstruction surveys for vernal pool invertebrates be conducted in compliance with USFWS protocols and for soil samples to be collected from dry on-site vernal pools. In addition, the ITMM would require full avoidance of conservancy fairy shrimp within the project site.

Given that the proposed project does not include site-specific development plans, designs, or proposals at this time, potential disturbance areas on-site are currently unknown. Thus, future construction activities such as clearing, grading, and other ground disturbing activities could result in the loss of wetland and vernal pool habitat within the project site. As such, without compliance with the SJMSCP, implementation of the proposed project could result in adverse effects to vernal pool invertebrates.

Roosting Bats

The pallid bat, Townsend's big-eared bat, and western mastiff bat are California Species of Special Concern. In addition, Townsend's big-eared bat, and western mastiff bat are SJMSCP covered species. The CNDDDB search returned one record each for pallid bat, Townsend's big-eared bat, and western mastiff occurrences within the project region.

During the bat maternity season, typically April 15 to August 31, the aforementioned bat species may roost, sometimes in large numbers, within the foliage, snags, and exfoliating bark of trees, as well as within abandoned structures and buildings. Maternity bat roosts are considered a type of native wildlife nursery site and disturbance to active maternal roost sites could lead to bat mortality.

Existing tree hollows, foliage, and exfoliating bark on trees within the project site could represent suitable day and maternity roosting habitat for pallid bat, Townsend's big-eared bat, and western mastiff bat. In addition, if the existing on-site structures and buildings are currently abandoned, or are abandoned in the future, pallid bat, Townsend's big-eared bat, and western mastiff bat could roost within such structures. As such, if special-status bats were roosting in trees proposed for removal or structures and buildings proposed for improvements or demolition as part of future construction activities, the bats could be injured or killed. Therefore, tree removal, as well as improvements to or demolition of any abandoned structures shall be avoided during the maternity roosting season (April 15 – August 31). If such activities cannot be avoided during the maternity roosting season, future on-site development would be required to comply with the ITMM for bats covered by the SJMSCP, as established by Section 5.2.4.28 of the SJMSCP. The ITMM for bats covered by the SJMSCP requires potential on-site roosting and hibernation sites be sealed and, if required, for colonial roosting sites to be removed outside of the nursery and hibernation season. Additionally, protocol-level surveys would be required to confirm the presence or absence of pallid bat within the project site prior to any ground disturbance associated with future development. Without compliance with the SJMSCP, as well as the completion of the aforementioned survey for pallid bat and avoidance of any active on-site maternity bat roosts, future on-site development facilitated by the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on special-status roosting bats.

It should be noted that although the pallid bat, Townsend's big-eared bat, and western mastiff bat have the potential to be injured or killed by future construction activities at

maternity roosts, the species would not be vulnerable to construction-related injury or mortality during other life stages.

Swainson's Hawk

The Swainson's hawk is a State-listed threatened species. In addition, Swainson's hawk is a SJMSCP covered species. The Swainson's hawk is generally a summer visitor to California; however, a small population of Swainson's hawks remain residents in California year-round. The Swainson's hawk inhabits open to semi-open areas at low to middle elevations in valleys, dry meadows, foothills, and level uplands. The species nests almost exclusively in trees and will nest in almost any tree species that is at least 10 feet tall. Swainson's hawks also occasionally nest in shrubs, on telephone poles, and on the ground. Foraging habitats include alfalfa fields, fallow fields, beet, tomato, and other low-growing row or field crops, dry-land and irrigated pasture, and rice land when not flooded. In addition, agricultural practices allow for access to prey, and very likely increases foraging success of Swainson's hawks when farm equipment flushes prey during harvesting.

The CNDDDB search returned 215 records of Swainson's hawk occurrences within five miles of the project site. The closest known CNDDDB record for the species is located 0.4-mile west of the project site. Trees growing within and adjacent to the project site provide suitable nesting habitat. In addition, the project site could provide foraging habitat that could be used by the Swainson's hawk. Therefore, future on-site development would be required to comply with the ITMM for Swainson's hawk as established by Section 5.2.4.11 of the SJMSCP. The ITMM for Swainson's hawk requires that known or potential Swainson's hawk nesting trees be avoided during construction activities or be removed outside of the Swainson's hawk nesting season (September 1 to February 15).

Given that the proposed project does not include site-specific development plans, designs, or proposals at this time, potential disturbance areas on-site are currently unknown. Thus, future construction activities such as clearing, grading, and other ground disturbing activities during the nesting season (February 15 through September 1) could result in injury or mortality of eggs and chicks directly through destruction, or indirectly through forced nest abandonment due to noise and other disturbance. As such, without compliance with the SJMSCP, implementation of the proposed project could result in adverse effects to Swainson's hawk.

Tricolored Blackbird

The tricolored blackbird is a State-listed threatened species. In addition, tricolored blackbird is a SJMSCP covered species. The Tricolored blackbird is typically found near freshwater, particularly near marsh habitat. Nesting colonies are typically found in stands of cattail, and bulrush, although the species are also known to utilize blackberry patches and thistle clumps adjacent to water. Flooded lands, margins of ponds, and grassy fields in summer and winter provide typical foraging habitat for the species.

The CNDDDB search returned 12 records of tricolored blackbird occurrences within five miles of the project site. The closest known CNDDDB record for the species is located approximately 400 feet east of the project site. As discussed above, vegetation indicative of potential wetlands may be present throughout the project site. Such vegetation could represent suitable habitat for tricolored blackbird. In addition, the project site could provide potential foraging habitat for the species. As such, tricolored blackbird could have the

potential to nest and forage within the project site. Therefore, future on-site development would be required to comply with the ITMM for colonial nesting birds as established by Section 5.2.4.16 of the SJMSCP. The ITMM for colonial nesting birds requires a 500-foot setback be established around occupied nests, should construction activities begin during the nesting season. Given that the proposed project does not include site-specific development plans, designs, or proposals at this time, potential disturbance areas on-site are currently unknown. Thus, future construction activities such as clearing, grading, and other ground disturbing activities during the nesting season could result in injury or mortality of eggs and chicks directly through destruction, or indirectly through forced nest abandonment due to noise and other disturbance. As such, without compliance with the SJMSCP, implementation of the proposed project could result in adverse effects to tricolored blackbird.

Western Burrowing Owl

Western burrowing owl is classified as a candidate species for potential listing under CESA, as well as being protected under the MBTA. In addition, western burrowing owl is a SJMSCP covered species. The primary habitat requirement for western burrowing owls is small mammal burrows that the species uses for nesting. Typically, the species uses abandoned ground squirrel burrows, but western burrowing owls have been known to dig burrows in softer soils. In urban areas, western burrowing owls may use pipes, culverts, and piles of material as artificial burrows. Western burrowing owls breed semi-colonally from March through August.

The CNDDDB search returned 53 records of burrowing owl occurrences within five miles of the project site. The closest known CNDDDB record for the species is located 0.3 mile west of the project site. Although the project site is currently developed and has been subject to previous disturbance, burrowing owls have been known to nest within urban areas. As such, the flat open areas within the project site could represent suitable nesting habitat for the species. In addition, given the proximity of the nearest recorded occurrence of the species to the project site, the potential exists for burrowing owl to occur on-site. Therefore, future on-site development would be required to comply with the ITMM for burrowing owl as established by Section 5.2.4.15 of the SJMSCP. The ITMM for burrowing owl requires the project applicant to prevent ground squirrels from occupying the project site prior to construction activities. If burrowing owls are known to occupy the project site, the ITMM for burrowing owls requires that any on-site owls be avoided during the breeding season (February 1 to August 31) or passively relocated during the non-breeding season (September 1 to January 31). It should be noted that subsequent to the adoption of the SJMSCP, western burrowing owl has become a candidate for listing under CESA. As such, additional mitigation, including but not limited to, acquisition of an Incidental Take Permit (ITP), if needed, would be required to ensure that impacts to burrowing owl associated with future on-site development would not occur. Without compliance with the SJMSCP, as well as additional mitigation, including acquisition of an ITP, if needed, future on-site development facilitated by the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on western burrowing owl.

Nesting Raptors and Migratory Birds

The project site contains existing trees and shrubs that could be used for nesting by raptors and migratory birds protected by the MBTA, including song sparrow, yellow-headed blackbird, loggerheaded shrike, merlin, and white-tailed kite. It should be noted that loggerheaded shrike, merlin, and white-tailed kite are SJMSCP covered species. If

such species occur on-site, future on-site development would be required to comply with the ITMMs established by Sections 5.2.4.18, 5.2.4.19, and 5.2.4.22 of the SJMSCP. The aforementioned ITMMs require preconstruction surveys of potential nesting trees, as well as establishment of setbacks around on-site nesting areas. However, additional raptors and migratory birds not covered by the SJMSCP are provided with protection under the MBTA, and have the potential to occur on-site. Construction activities that adversely affect the nesting success of raptors and migratory birds (i.e., lead to the abandonment of active nests) or result in mortality of individual birds constitute a violation of State and federal laws. Thus, in the event that raptors and migratory bird species not covered by the SJMSCP occur on-site during the breeding season, construction activities associated with future development of the project site could result in an adverse effect to species protected under the MBTA. As such, without compliance with the SJMSCP for covered species or implementation of mitigation for non-covered species, future development facilitated by the proposed project could result in adverse effects to nesting raptors and migratory birds.

Conclusion

Based on the above, future development of the project site, as provided by the proposed project, could potentially result in adverse effects to special-status plant species, California tiger salamander, western spadefoot, giant garter snake, vernal pool invertebrates, pallid bat, Townsend's big-eared bat, and western mastiff bat, Swainson's hawk, tricolored blackbird, western burrowing owl, and other nesting migratory birds and raptors. As such, the proposed project could result in an adverse effect, either directly or through habitat modifications, on species identified as special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS. Therefore, the impact would be **potentially significant**.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

SJMSCP-Covered Species

IV-1. Prior to commencement of any future on-site grading activities, the project proponent shall seek coverage under the SJMSCP to mitigate for habitat impacts to covered special-status species. Coverage involves compensation for habitat impacts on covered species through implementation ITMMs and payment of fees for conversion of lands that may provide habitat for covered special status species. These fees are used to preserve and/or create habitat in preserves to be managed in perpetuity. Obtaining coverage for a Project includes incidental take authorization (permits) under the Endangered Species Act Section 10(a), California Fish and Game Code Section 2081, and the MBTA. Coverage under the SJMSCP would fully mitigate all habitat impacts on covered special-status species.

Special-Status Plants

IV-2. Prior to issuance of any grading permits for future development within the project site, focused surveys shall be performed by a qualified botanist in order to determine the presence or absence of any special status plant species. Furthermore, should additional plants having the potential to occur on-site be given special-status in the future, the qualified botanist shall also

determine the presence/absence of such species. The survey(s) shall be conducted during the identification periods (bloom periods) for special status plant species that are known to occur in the project region. If special-status plant species are not found to be present during the focused survey(s), then no further action is required. The results of the focused surveys shall be submitted to the City of Manteca Development Services Department.

If any special-status plant species are found, a mitigation plan shall be prepared in consultation with the City of Manteca Development Services Department. The plan shall detail the various mitigation approaches to ensure no net loss of the special-status plant(s). Mitigation could include, but would not be limited to, avoidance of the plant species, salvage of plant materials where possible, acquisition of credits at an approved mitigation bank, or acquisition and preservation of property that supports the plant species.

Pallid Bat IV-3.

In order to avoid impacts to maternity roosting pallid bats, future tree trimming or removal, as well as improvements to or demolition of existing abandoned structures within the project site shall be avoided during the maternity roosting season (April 15 – August 31).

If future tree trimming or removal, or improvements to or demolition of existing abandoned structures must occur during the maternity roosting season (April 15 – August 31) within the project site, a qualified biologist shall conduct a pre-construction survey for maternity roosting bats within 14 days of the onset of these activities. Maternity roosting bat surveys shall include all trees and structures proposed to be impacted. Survey results shall be submitted to the City of Manteca Development Services Department. If active maternity bat roosts are not found within the survey area, further mitigation is not required.

Should any active maternity bat roosts be discovered during the pre-construction survey in trees or structures proposed to be impacted, the biologist shall identify a suitable construction-free buffer around the maternity roost. An example of a suitable construction free buffer is 50 feet; however, each buffer distance should be determined on a case-by-case basis by the qualified biologist. The buffer shall be identified on the ground with flagging or fencing, and shall be maintained until a qualified biologist has determined that the tree and snag impacts would not adversely affect bat survival or survival of their young.

Burrowing Owl IV-4.

A pre-construction survey for burrowing owls within the site and a 500 foot buffer surrounding the site shall be conducted within 15 days of future on-site construction. The pre-construction survey shall be conducted by a qualified biologist consistent with the CDFW 2012 Staff Report on Burrowing Owl Mitigation. If a lapse in future on-site work of 15 calendar days or longer occurs, an additional survey shall be required prior to

reinitiation. A written summary of the survey results shall be submitted to the City of Manteca Development Services Department before any construction permits are issued. If burrowing owls or active burrows/refugia are not found, then further mitigation measures are not necessary.

If an active burrow (i.e., a burrow occupied by at least one adult burrowing owl) is found, the project applicant shall implement the following measures:

1. Avoid all nest sites that could be disturbed by Project construction during the remainder of the breeding season or while the nest is occupied by adults or young (including individuals or family groups foraging on or near the site following fledging); and
2. Establish and maintain a minimum buffer of 164 feet around the occupied burrow during construction. The actual buffer size shall be determined by the qualified biologist based on the time of year and level of disturbance in accordance with guidance provided in the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012) and may be as large as 1,640 feet. Construction activities shall not take place within the buffer, and the no-disturbance buffer shall be marked on-site. Any modifications to the aforementioned buffer shall be approved by the City in consultation with CDFW. The buffer reduction request shall include relevant information and/or propose new measures to justify the buffer reduction. The buffer may be removed once the burrow is not occupied.
3. Burrow exclusion shall only be conducted during the non-breeding season for active burrows located within the site boundaries, and in limited instances within a buffer zone around the site, as determined by the City in consultation with CDFW after all avoidance and minimization measures have been exhausted. The Project applicant shall acquire an ITP from CDFW prior to exclusion. Following the ITP, any exclusion and burrow collapse activities shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation. The foregoing guidance requires a Burrowing Owl Exclusion Plan to be developed and approved by a qualified biologist in consultation with CDFW for the City's review and approval prior to burrow exclusion and/or closure.

If nesting burrowing owls are found during the pre-construction survey, mitigation for the permanent loss of burrowing owl foraging habitat (defined as all areas of suitable habitat within 250 feet of the active burrow) shall be accomplished at a 1:1 ratio or at a ratio acceptable to the City. The mitigation provided shall be consistent with recommendations in the CDFW Staff Report on Burrowing Owl Mitigation.

Nesting Migratory Birds and Raptors

IV-5.

If future development activities commence during the avian breeding season (February 1 through August 31), a qualified biologist shall conduct a pre-construction nesting bird survey within seven days prior to initiation of project activities. The survey area shall include suitable raptor nesting habitat within 500 feet of the project boundary (inaccessible areas outside of the project area can be surveyed from the site or from public roads using

binoculars or spotting scopes). Pre-construction surveys are not required in areas where project activities have been continuous since prior to February 1, as determined by a qualified biologist. Areas that have been inactive for more than 14 days during the avian breeding season must be re-surveyed prior to resumption of project activities. Results of the preconstruction survey shall be submitted to the City of Manteca Development Services Department for review. If active nests are not identified, further mitigation is not required. If active nests are identified, the following measure shall be implemented:

- *A species-specific buffer shall be established by a qualified biologist around active nests, and construction activities shall not occur within the buffer until a qualified biologist has determined that the nest is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest, or the nest has failed). Encroachment into the buffer may occur at the discretion of a qualified biologist. Any encroachment into the buffer shall be monitored by a qualified biologist to determine whether nesting birds are being impacted.*

b,c. As discussed above, vegetation indicative of potential wetlands may be present throughout the project site. As such, aquatic resources, protected wetlands, riparian habitat, and otherwise sensitive communities could exist on the project site. However, site-specific surveys and wetland delineations have not been conducted to confirm the presence of any potential on-site wetlands. In addition, given that the proposed project does not include site-specific development plans, designs, or proposals at this time, potential disturbance areas on-site are currently unknown. Therefore, without the completion of a site-specific aquatic resources delineation to identify potential on-site aquatic habitat and avoidance of such habitat, as well as issuance of all applicable USACE and RWQCB permits, implementation of the proposed project and future development of the project site could result in a substantial adverse effect on a riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS or related to having a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Consequently, a **potentially significant** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

- IV-6. *Prior to the commencement of future on-site construction activities, an aquatic resources delineation shall be conducted for the project site by a qualified biologist. The project proponent shall submit the results of the aquatic resources delineation to the USACE for verification purposes. If USACE takes jurisdiction over the on-site aquatic habitat, then the applicant shall apply for a Section 404 permit and Waters that will be impacted shall be replaced or rehabilitated on a “no-net-loss” basis. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by methods acceptable to the USACE. Written*

verification of the Section 404 permit shall be submitted to the City of Manteca Development Services Department.

IV-7. Prior to the commencement of future on-site construction activities that could result in impacts to potentially regulated aquatic features, the project proponent shall apply for a Section 401 water quality certification/waste discharge requirement from the RWQCB, and adhere to the certification conditions. Written verification of the Section 401 permit shall be submitted to the City of Manteca Development Services Department.

- d. Movement corridors or landscape linkages are usually linear habitats that connect two or more habitat patches, providing assumed benefits to the species by reducing inbreeding depression and increasing the potential for recolonization of habitat patches. The project site is located in an urbanized area of the City, and is bound by a major roadway to the north. Surrounding existing land uses include commercial uses to the north; commercial uses and single-family residences to the east, agricultural uses to the south; and agricultural uses and the Manteca WWTP to the west. The existing setting of the surrounding area limits the potential for use of the project site as a wildlife movement corridor. In addition, the project site is currently developed and has been subject to previous disturbance, including previous grading and ongoing landscaping maintenance. While the project site does not include any rivers or creeks that would support aquatic species, an existing canal is located with the parcel adjacent to the southern boundary of the project site. However, because the canal is not located within the boundaries of the project site, disturbance of the canal associated with future development of the site is not anticipated. Thus, future development of the project site would not substantially interfere 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 wildlife nursery sites, and a **less-than-significant** impact would occur.
- e. Existing on-site trees are located around the existing industrial and commercial uses, as well as the single-family residences within the project site. While the proposed project does not include any site-specific development plans, designs, or proposals, the future removal of any on-site trees would be required to comply with all provisions set forth in Section 12.08.070, Tree Trimming or Removal, and Section 17.48.060, Landscape Care, Maintenance, and Replacement, of the Municipal Code.

Because the proposed project would not include development of the project site and future development of the project site would be required to comply with the City of Manteca's Municipal Code provisions related to tree removal, the proposed project would have a **less-than-significant** impact related to conflicting with local policies or ordinances protecting biological resources.

- f. On February 5, 2001, the City of Manteca adopted the SJMSCP. The SJMSCP covers 97 fish, plant, and wildlife species which are afforded varying degrees of protection under CEQA, the California Endangered Species Act, the U.S. Endangered Species Act, the MBTA, and other local, State, and federal regulations. Chapter 13.40 of the City's Municipal Code requires project applicants to pay applicable development fees to fund implementation of the SJMSCP. The project site is shown on the City of Manteca SJMSCP Compensation Map as Category B, Other Open Spaces, Pay Zone A. Future on-site development facilitated by the proposed project would likely be required to participate in

the SJMSCP and payment of mitigation fees may be used to mitigate for loss of special-status species and special-status plant species. Payment of fees and compliance with AMMs would minimize direct impacts and ensure that the proposed project would not conflict with an HCP. Furthermore, implementation of Mitigation Measure IV-1 would ensure that any future potential impacts to species covered by the SJMSCP would be reduced to less-than-significant levels. As such, the proposed project would result in a ***less-than-significant*** impact related to conflicting with the provisions of an adopted Habitat Conservation Plan.

V. CULTURAL RESOURCES.

Would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

a-c. Historical resources are features that are associated with the lives of historically important persons and/or historically significant events, that embody the distinctive characteristics of a type, period, region or method of construction, or that have yielded, or may be likely to yield, information important to the pre-history or history of the local area, California, or the nation. Examples of typical historical resources include, but are not limited to, buildings, farmsteads, rail lines, bridges, and trash scatters containing objects such as colored glass and ceramics.

Currently, the project site is developed with several existing structures and consists of a mix of industrial and commercial uses, as well as single-family residences. A records search of the CHRIS was performed by the Central California Information Center (CCIC) for cultural resource site records and survey reports within the project area.¹³ The CCIC concluded that the project site does not contain any formally recorded prehistoric or historic archaeological resources or historic buildings or structures on any lists of historic resources. Because the proposed project does not include ground disturbing activities, the CCIC determined that further study for on-site archaeological resources is not recommended at this time. However, the CCIC determined that because the project site has not been subject to previous site-specific investigations, and contains existing on-site structures of unknown age, further evaluation would be required prior to any future demolition activities and/or ground disturbance to determine if the existing on-site structures are 45 years or older and, thus, considered to be historical resources. A search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was conducted for the project site, which yielded a negative result.¹⁴

Because the ages of the existing on-site structures are currently unknown, in the absence of further evaluation future development of the project site, as facilitated by the proposed project, could cause a substantial adverse change in the significance of a historical resource. In addition, unknown archaeological resources, including human remains, have the potential to be uncovered during ground-disturbing activities at the project site, and the future development of the project site could cause a substantial adverse change in the significance of a unique archaeological resource pursuant to CEQA Guidelines Section 15064.5 and/or disturb human remains, including those interred outside of dedicated cemeteries, during construction. Therefore, without mitigation, impacts could be considered **potentially significant**.

¹³ Central California Information Center. *Records Search File#: 13586L, Project: Yosemite Mixed-Use Conversion*. December 12, 2025.

¹⁴ Native American Heritage Commission. *Re: Yosemite Mixed-Use Conversion Project, San Joaquin County*. December 30, 2025.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

- V-1. *Prior to the issuance of any demolition permits associated with future development of the project site, a historical resource evaluation, including surveys on the 21 existing on-site buildings and structures, shall be conducted to determine if the buildings and structures would meet criteria for inclusion on the California Register of Historical Resources (CRHR) or National Register of Historic Places (NRHP). The evaluation of the buildings and structures shall be conducted by an architectural historian who meets the Secretary of the Interior's Standards.*

Evaluation of the buildings and structures shall include: the development of an appropriate historical context applicable to the building/structure type and potential period of significance; an examination of the architecture or engineering of the building/structure; and sufficient historical research about the property to establish the potentially important people associated with the building/structure. Once completed, a determination of the building/structure's eligibility for inclusion on the CRHR or NRHP shall be made, as well as a determination of the building/structure's integrity. The qualified architectural historian shall document the results of the evaluation in a report and on appropriate Department of Parks and Recreation (DPR) 523 forms. All materials shall be submitted to the City of Manteca Development Services Department as proof of compliance.

If a formal evaluation finds that a building and/or structure meets criteria for listing on the CRHR or NRHP, the eligible building or structure would be required to be fully avoided and preserved, and demolition of the building or structure as part of future development would be prohibited. In addition, any structures that are required to be fully avoided and preserved shall also be protected during any future construction activities on site, protection measures may include but are not limited to, buffers around the structures, fencing, or other delineation, etc.

- V-2. *If potentially significant historic or archeological resources are encountered during future subsurface excavation activities, all construction activities within a 100-foot radius of the resource shall cease until a qualified archaeologist determines whether the resource requires further study. The City shall require that the applicant include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction shall be recorded on appropriate California Department of Parks and Recreation forms and evaluated for significance in terms of California Environmental Quality Act criteria by a qualified archaeologist. Potentially significant cultural resources consist of but are not limited to stone, bone, fossils, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. If the resource is determined to be significant under CEQA, the City and a qualified archaeologist shall determine whether preservation in place is feasible. Such preservation in place is the preferred mitigation. If such preservation is infeasible, the*

qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan for the resource. The archaeologist shall also conduct appropriate technical analyses, prepare a comprehensive written report and file it with the appropriate information center (California Historical Resources Information System), and provide for the permanent curation of the recovered materials.

V-3.

If previously unknown human remains are encountered during future construction activities, Section 7050.5 of the California Health and Safety Code applies, and the following procedures shall be followed: In the event of an accidental discovery or recognition of any human remains, Public Resource Code Section 5097.98 must be followed. The City shall require that the applicant include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Once project-related ground disturbance begins and if there is accidental discovery of human remains, the following step shall be taken:

- *There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the San Joaquin County Coroner's Office is contacted to determine if the remains are Native American and if an investigation into cause of death is required. If the coroner determines the remains are Native American, the coroner shall contact the NAHC within 24 hours, and the NAHC shall identify the person or persons it believes to be the "most likely descendant" of the deceased Native American. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.*

VI. ENERGY.

Would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a,b. The proposed project would include a GPA and rezone, and does not include site-specific development plans, designs, or proposals at this time. While the proposed project would not directly result in increased energy use relative to existing conditions, approval of the proposed project could result in reasonably foreseeable future development within the site, and additional energy use may occur. However, the lack of site-specific development applications, including the design and location of specific improvements, makes the quantification of the project’s energy usage highly speculative at this time.

The main forms of available energy supply are electricity, natural gas, and oil. A description of the 2025 California Green Building Standards Code and the Building Energy Efficiency Standards, with which future on-site development facilitated by the proposed project would be required to comply, as well as discussions regarding the potential effects related to energy demand during construction and operations of any future on-site development are provided below. It should be noted that, depending on when future development is proposed, such development may be subject to future California Green Building Standards Code and the Building Energy Efficiency Standards. However, such standards are anticipated to be more stringent than current standards.

California Green Building Standards Code

The 2025 California Green Building Standards Code, otherwise known as the CALGreen Code (CCR Title 24, Part 11), is a portion of the 2025 CBSC, which became effective with the rest of the CBSC on January 1, 2026. The purpose of the CALGreen Code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices. The provisions of the code apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout California. Requirements of the CALGreen Code include, but are not limited to, the following measures:

- Compliance with relevant regulations related to future installation of Electric Vehicle (EV) charging infrastructure in residential and non-residential structures;
- Indoor water use consumption is reduced through the establishment of maximum fixture water use rates;
- Outdoor landscaping must comply with the California Department of Water Resources’ Model Water Efficient Landscape Ordinance (MWELO), or a local ordinance, whichever is more stringent, to reduce outdoor water use;
- Diversion of 65 percent of construction and demolition waste from landfills; and

- Mandatory use of low-pollutant emitting interior finish materials such as paints, carpet, vinyl flooring, and particle board.

Building Energy Efficiency Standards

The 2025 Building Energy Efficiency Standards is a portion of the CBSC, which expands upon energy efficiency measures from the 2022 Building Energy Efficiency Standards, resulting in a reduction in energy consumption from the 2022 standards for residential structures. Energy reductions relative to previous Building Energy Efficiency Standards would be achieved through various regulations including requirements for the use of high efficacy lighting, improved water heating system efficiency, and high-performance attics and walls.

Construction Energy Use

Construction of any future on-site development facilitated by the proposed project would involve on-site energy demand and consumption related to use of oil in the form of gasoline and diesel fuel for construction worker vehicle trips, hauling and materials delivery truck trips, and operation of off-road construction equipment. In addition, diesel-fueled portable generators may be necessary to provide additional electricity demands for temporary on-site lighting, welding, and for supplying energy to areas of the site where energy supply cannot be met via a hookup to the existing electricity grid. However, future construction activities, including the off-site extension of any necessary utilities would not involve the use of natural gas appliances or equipment.

Even during the most intense period of construction, due to the different types of construction activities (e.g., site preparation, grading, paving, limited amounts of building construction), only portions of the project site would be disturbed at a time, with operation of construction equipment occurring at different locations on the project site, rather than a single location. In addition, all construction equipment and operation thereof would be regulated pursuant to the CARB In-Use Off-Road Diesel Vehicle Regulation, which is intended to reduce emissions from in-use, off-road, heavy-duty diesel vehicles in California by imposing limits on idling, requiring all vehicles to be reported to CARB, restricting the addition of older vehicles into fleets, and requiring fleets to reduce emissions by retiring, replacing, or repowering older engines, or installing exhaust retrofits. The In-Use Off-Road Diesel Vehicle Regulation would subsequently help to improve fuel efficiency and reduce GHG emissions. Technological innovations and more stringent standards are being researched, such as multi-function equipment, hybrid equipment, or other design changes, which could help to reduce demand on oil and emissions associated with construction.

Based on the above, the temporary increase in energy use during construction of future on-site development facilitated by the proposed project would not result in a significant increase in peak or base demands or require additional capacity from local or regional energy supplies. Future development would be required to comply with all applicable regulations related to energy conservation and fuel efficiency, which would help to reduce the temporary increase in demand.

Operational Energy Use

Energy use associated with operation of any future on-site development facilitated by the proposed project would be typical of residential and commercial uses, requiring electricity for interior and exterior building lighting, operation of stoves, kitchen and cleaning

appliances, security systems, and more. Maintenance activities during operations, such as landscape maintenance, would involve the use of electric or gas-powered equipment. In addition to on-site energy use, future on-site development would result in transportation energy use associated with vehicle trips generated by employee commutes, visitors, residents, and the movement of goods.

Any future development would be subject to all relevant provisions of the most recent update of the CBSC (CCR, Title 24, Part 11), including the Building Energy Efficiency Standards. Adherence to the most recent CALGreen Code and Building Energy Efficiency Standards, and all applicable actions included in the City's Climate Action Plan (CAP) would ensure that future development within the project site would consume energy efficiently. As such, required compliance with the CBSC would ensure that the building energy use associated with future permitted uses on-site would not be wasteful, inefficient, or unnecessary. In addition, electricity supplied to future on-site buildings would comply with the State's Renewable Portfolio Standard (RPS), which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 60 percent of total procurement by 2030, and 100 percent by 2045.¹⁵ Thus, a portion of the energy consumed during operations would originate from renewable sources. With regard to transportation energy use, future development would be required to comply with all applicable regulations associated with vehicle efficiency and fuel economy. In addition, as discussed in Section XVII, Transportation, of this IS/MND, the proposed project would meet the City's vehicle miles travelled (VMT) screening criteria, and would result in a less-than-significant impact related to VMT.

Based on the above, compliance with the State's latest Energy Efficiency Standards would ensure that future development of the project site would implement all necessary energy efficiency regulations.

Conclusion

Based on the above, the proposed project, as well as future construction and operations on the project site would not result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and **a less-than-significant** impact would occur.

¹⁵ California Energy Commission. *Renewables Portfolio Standard – RPS*. Available at: <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard>. Accessed February 2026.

VII. GEOLOGY AND SOILS.

Would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

ai-ii. Pursuant to the General Plan EIR, Manteca is not located within an Alquist-Priolo Fault-Rupture Hazard Zone, and known active surface fault ruptures are not located within or adjacent to the General Plan EIR Study Area. In addition, according to the California Department of Mines and Geology Seismic Hazard Zone Mapping System, the project site is not located within an Alquist-Priolo Fault-Rupture Hazard Zone.¹⁶ However, numerous faults are located in the region, including an unnamed fault east of the City of Tracy, the San Joaquin fault, the Midway fault, the Corral Hollow-Carnegie fault, the Greenville fault, the Antioch fault, and the Los Positas fault. Rupture of any of the aforementioned faults, or of an unknown fault in the region, could cause seismic ground shaking.

The proposed project does not include site-specific development plans, designs, or proposals at this time. Nonetheless, future development of the project site would be required to be designed in accordance with the CBSC. Projects designed in accordance with the CBSC should be able to: 1) resist minor earthquakes without damage; 2) resist moderate earthquakes without structural damage, but with some non-structural damage; and 3) resist major earthquakes without collapse, but with some structural, as well as non-structural, damage. Although conformance with the CBSC does not guarantee that substantial structural damage would not occur in the event of a maximum magnitude

¹⁶ California Department of Conservation. *Earthquake Zones of Required Investigation*. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>. Accessed December 2025.

earthquake, conformance with the CBSC can reasonably be assumed to ensure that future structures on the project site would be survivable, allowing occupants to safely evacuate in the event of a major earthquake. Therefore, a **less-than-significant** impact would occur related to seismic surface rupture and strong seismic ground shaking.

a.iii, a.iv, The proposed project's potential effects related to liquefaction, subsidence, landslides, lateral spreading, and expansive soils are discussed in detail below.

Liquefaction

Liquefaction is a phenomenon in which granular material is transformed from a solid state to a liquefied state as a consequence of increased pore-water pressure and reduced effective stress. Increased pore-water pressure is induced by the tendency of granular materials to densify when subjected to cyclic shear stresses associated with earthquakes. According to the California Department of Conservation California Geological Survey, the project site is not located within a designated seismic hazard zone for liquefaction.¹⁷ Thus, future development of the project site would not be subject to substantial liquefaction risks.

Landslides

Seismically-induced landslides are triggered by earthquake ground shaking. The risk of landslide hazard is greatest in areas with steep, unstable slopes. The topography of the project site is relatively level, and the site is not located on or near any slopes. In addition, according to the California Department of Conservation California Geologic Survey, the project site is not located in a known landslide zone.¹⁸ Therefore, future development of the project site would not be subject to substantial landslide risks.

Lateral Spreading

Lateral spreading is horizontal/lateral ground movement of relatively flat-lying soil deposits towards a free face such as an excavation, channel, or open body of water; typically, lateral spreading is associated with liquefaction of one or more subsurface layers near the bottom of the exposed slope. The project site does not contain any slopes and is not located near any open faces that would be considered susceptible to lateral spreading. In addition, as previously discussed, implementation of the proposed project would not result in risks related to liquefaction. Based on the above, the potential for lateral spreading to pose a risk to the proposed development is low.

Subsidence/Settlement

Subsidence is the gradual settling or sinking of the earth's surface with little horizontal movement. Subsidence takes place gradually, usually over a period of several years. The General Plan EIR determined that drainage sufficient to create subsidence is uncommon within the City of Manteca, and that subsidence has not been identified as an issue within the Planning Area. Therefore, the potential for subsidence to affect the site is low.

Conclusion

Based on the above, the proposed project would not result in substantial risks related to liquefaction, landslides, lateral spreading, or subsidence. In addition, all future on-site development would be required to comply with the policies and actions set forth in the City's General Plan relating to seismic and geologic hazards, as well as all other applicable

¹⁷ California Department of Conservation. *Earthquake Zones of Required Investigation*. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzappl/>. Accessed December 2025.

¹⁸ *Ibid.*

federal and State policies and standards, including the CBSC, as discussed above. Furthermore, in accordance with General Plan Action S-2a, any future on-site development would be required to prepare a project-specific geotechnical report and incorporate all recommendations included therein. Thus, a **less-than-significant** impact would occur.

- b. Issues related to erosion are discussed in Section X, Hydrology and Water Quality, of this IS/MND. As noted therein, the proposed project would not result in substantial soil erosion or the loss of topsoil. Thus, a **less-than-significant** impact would occur.
- d. Expansive soils are soils which undergo significant volume change with changes in moisture content. Specifically, such soils shrink and harden when dried and expand and soften when wetted, potentially resulting in damage to building foundations. According to Figure 3.6-4, Shrink Swell Potential of Soils, of the General Plan EIR, soils within the project site have a low expansion potential. Therefore, the proposed project would not have the potential to result in any risks related to expansive soils.

In addition, all future on-site development would be required to comply with the policies and actions set forth in the City's General Plan relating to seismic and geologic hazards, as well as all other applicable federal and State policies and standards, including the CBSC. Furthermore, pursuant to General Plan Action S-2a, any future on-site development would be required to prepare a project-specific geotechnical report and incorporate all recommendations included therein. Thus, a **less-than-significant** impact would occur.

- e. The proposed project would include a GPA and rezone, and does not include site-specific development plans, designs, or proposals at this time. As such, the construction or operation of septic tanks or other alternative wastewater disposal systems is not included as part of the project. In addition, future development of the project site would be required to connect to the City's existing sewer system. Therefore, **no impact** regarding the capability of soil to adequately support the use of septic tanks or alternative wastewater disposal systems would occur.
- f. Paleontological resources or fossils are the remains of prehistoric plant and animal life. As noted in the General Plan EIR, the City of Manteca is located in a region where fossils and paleontological resources have been previously identified. The project site has been subject to previous disturbance, including previous grading and ongoing landscaping maintenance. Additionally, known unique paleontological or geological features have not been previously identified within the project site. However, future on-site development facilitated by the proposed project would likely require ground-disturbing activities. Therefore, while unlikely, if a unique paleontological resource or unique geologic feature were to be found during future on-site construction, a **potentially significant** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above impact to a **less-than-significant** level.

- VII-1. *In the event that plant or animal fossils are discovered during subsurface excavation activities for future development of the project site, all*

ATTACHMENT 8

excavation within 50 feet of the fossil shall cease until a qualified paleontologist has determined the significance of the find and provides recommendations in accordance with Society of Vertebrate Paleontology standards. The City shall require that the applicant include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The paleontologist shall notify the City of Manteca to determine procedures to be followed before construction is allowed to resume at the location of the find. If the find is determined to be significant and the City determines that avoidance is not feasible, the paleontologist shall design and implement a data recovery plan consistent with the Society of Vertebrate Paleontology standards. The plan shall be submitted to the City for review and approval. Upon approval, the plan shall be incorporated into the project.

VIII. GREENHOUSE GAS EMISSIONS.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>

Discussion

a,b. Emissions of greenhouse gases (GHGs) contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on earth. An individual project's GHG emissions are at a micro-scale level relative to global emissions and effects to global climate change; however, an individual project could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact. As such, impacts related to emissions of GHG are inherently considered cumulative impacts.

Implementation of the future development facilitated by the proposed project would cumulatively contribute to increases of GHG emissions. Estimated GHG emissions attributable to future development would be primarily associated with increases of carbon dioxide (CO₂) and, to a lesser extent, other GHG pollutants, such as methane (CH₄) and nitrous oxide (N₂O) associated with area sources, mobile sources or vehicles, utilities (electricity), water usage, wastewater generation, and the generation of solid waste. The primary source of GHG emissions for the project would be mobile source emissions. The common unit of measurement for GHG is expressed in terms of annual metric tons of CO₂ equivalents (MTCO₂e/yr).

In September 2006, AB 32 was enacted, which requires that statewide GHG emissions be reduced to 1990 levels by the year 2020. AB 32 delegated the authority for implementation to the CARB and directs the CARB to enforce the statewide cap. In accordance with AB 32, CARB prepared the Climate Change Scoping Plan (Scoping Plan) for California, which was approved in 2008 and subsequently revised in 2014 and 2017. The 2017 revision to the Scoping Plan updated the plan in compliance with SB 32. SB 32 codified emissions reduction targets for the year 2030, which had previously been established by Executive Order B-30-15.

The estimated unmitigated maximum annual GHG emissions resulting from the construction and operations of future on-site development facilitated by the proposed project were modeled for informational purposes. GHG emissions were modeled using the CalEEMod model under the same assumptions as discussed in Section III, Air Quality, of this IS/MND. All modeling results are included as Appendix A.

According to the CalEEMod model, future on-site development facilitated by the proposed project would generate the maximum unmitigated GHG emissions of 1,166.42 MTCO₂e/yr during construction and 12,173.00 MTCO₂e/yr during operations.

Per Section 15183.5 of the CEQA Guidelines, a project may satisfy applicable GHG analysis requirements under CEQA by demonstrating compliance with a qualified Climate Action Plan (CAP). Specifically, Section 15183.5 states the following:

Lead agencies may analyze and mitigate the significant effects of greenhouse gas emissions at a programmatic level, such as in a general plan, a long range development plan, or a separate plan to reduce greenhouse gas emissions. Later Project-specific environmental documents may tier from and/or incorporate by reference that existing programmatic review. Project-specific environmental documents may rely on an EIR containing a programmatic analysis of greenhouse gas emissions as provided in section 15152 (tiering), 15167 (staged EIRs) 15168 (program EIRs), 15175-15179.5 (Master EIRs), 15182 (EIRs Prepared for Specific Plans), and 15183 (EIRs Prepared for General Plans, Community Plans, or Zoning).

On November 20, 2025, the City of Manteca adopted their CAP Update, which is intended to achieve consistency with the State's emissions limits and the 2022 Scoping Plan Update. The CAP is designed to reduce community-related and City operations-related GHG emissions to achieve the goals above. In order to do such, the City has outlined a course of action for the City government and the community of Manteca to reduce per capita GHG emissions. Projects showing consistency with the CAP would be considered not to contribute significant GHG emissions impacts.

For new development projects constructed in the City of Manteca, the CAP Update requires the development projects to achieve GHG emissions reductions by implementing specific reduction strategies. The City of Manteca CAP Update is consistent with the States emissions limits and the 2022 Scoping Plan and, therefore, projects considered consistent with the CAP would be considered to result in a less-than-significant impact related to GHG emissions. Additionally, the Manteca CAP includes a consistency checklist to be used in documenting the consistency of new development within the City of Manteca.

As discussed previously, the proposed project does not include any site-specific development plans, designs, or proposals at this time. However, the Manteca CAP consistency checklist is a part of the project application requirements for the City of Manteca. Therefore, any applications for future development on the project site would be required to prepare a Manteca CAP consistency checklist and show compliance with the Manteca CAP.

Based on the above, because preparation of a Manteca CAP consistency checklist showing compliance with the Manteca CAP would be a part of the application requirements for future development, the proposed project would not generate GHG emissions that would have a significant impact on the environment or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG. Therefore, impacts would be ***less than significant***.

IX. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to the risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a. The proposed project does not include any site-specific development plans, designs, or proposals at this time, and, thus, would not directly involve the routine transport, use, or disposal of hazardous materials. However, the proposed project could allow for future commercial and residential development on-site.

With regard to the potential future commercial uses within the project site, because the proposed project does not include site-specific development plans, designs, or proposals at this time, the eventual tenants of the site are not currently known. However, operations associated with future commercial uses are anticipated to be typical of other commercial uses in the City and would be governed by the uses permitted for the site as established by the City’s Municipal Code and General Plan. In addition, the use, handling, and storage of hazardous materials is regulated by both the Federal Occupational Safety and Health Administration (Fed/OSHA) and the California Occupational Safety and Health Administration (Cal/OSHA). Cal/OSHA is responsible for developing and enforcing workplace safety regulations. At the local level, the San Joaquin County Environmental Health Department regulates hazardous materials within the County, including chemical storage containers, businesses that use hazardous materials, and hazardous waste management. Therefore, in the event that future commercial operations on the project site would involve the routine use, transport, or disposal of hazardous materials, such materials would be managed in accordance with the applicable regulations such as the regulations set forth by 22 CCR Section 66263, Standards Applicable to Transporters of Hazardous Waste, which requires transporters of hazardous materials to ensure that

releases of hazardous wastes into the environment would not occur, including the discharge of hazardous wastes into soils, drainage systems, and surface and groundwater systems. In addition, 22 CCR Section 66263.31 requires transporters of hazardous materials to clean up any hazardous waste discharge that occurs during transportation to the extent that hazardous waste discharge no longer presents a hazard to human health or the environment. Compliance with such measures would ensure that, if hazardous materials are used on-site in the future, such materials would not present a significant hazard.

In addition, residential uses are not typically associated with the routine transport, use, disposal, or generation of substantial amounts of hazardous materials. Maintenance and operation of the future residential uses may use common household cleaning products, fertilizers, and herbicides on-site, any of which could contain potentially hazardous chemicals; however, such products would be expected to be used in accordance with label instructions. Due to the regulations governing use of such products and the amount anticipated to be used in conjunction with any future residential development on the project site, routine use of such products would not represent a substantial risk to public health or the environment.

Based on the above, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Thus, a ***less-than-significant*** impact would occur.

- b. Construction activities associated with future development of the project site would involve the use of heavy equipment, which would contain fuels and oils, and various other products such as concrete, paints, and adhesives. Small quantities of potentially toxic substances (e.g., petroleum and other chemicals used to operate and maintain construction equipment) would be used at the project site and transported to and from the site during construction. However, the contractors would be required to comply with all California Health and Safety Codes and local City ordinances regulating the handling, storage, and transportation of hazardous and toxic materials. Pursuant to California Health and Safety Code Section 25510(a), except as provided in subdivision (b), the handler or an employee, authorized representative, agent, or designee of a handler, shall, upon discovery, immediately report any release or threatened release of a hazardous material to the unified program agency (in the case of the proposed project, the San Joaquin County Environmental Health Department) in accordance with the regulations. The handler or an employee, authorized representative, agent, or designee of the handler shall provide all State, city, or county fire or public health or safety personnel and emergency response personnel with access to the handler's facilities. In the case of future on-site development, the contractor would be required to notify the San Joaquin County Environmental Health Department in the event of an accidental release of a hazardous material, who would then monitor the conditions and recommend appropriate remediation measures. In addition, should imported fill be required during construction of future on-site development facilitated by the proposed project, the location selling the utilized fill would be required to comply with all applicable State regulations, thus ensuring that the imported soil is free of contamination. As such, future construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment.

However, future on-site development facilitated by the proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment should the site contain potential Recognized Environmental Conditions (RECs) that are not properly addressed prior to project implementation. A REC indicates the presence or likely presence of any hazardous substances in, on, or at a property due to any release into the environment, under conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment.

The proposed project's potential effects related to the likely release of hazardous materials through existing site conditions, construction activities, and operations are discussed in detail below.

Existing Project Site Conditions

As previously discussed, the project site is currently developed with a mix of industrial and commercial uses, as well as existing single-family residences. According to a National Fire Protection Association (NFPA) 704 placard currently posted along the fence surrounding the existing industrial uses within the western portion of the project site, the existing on-site uses currently involve the use of hazardous materials. The NFPA 704 placard indicates that the hazardous materials currently used within the project site represent a slightly hazardous health hazard. Additionally, all hazardous materials on-site would be required to be used in accordance with all California Health and Safety Codes and local ordinances regulating the handling, storage, and transportation of hazardous and toxic materials. However, due to the unknown nature of the use of such material(s), without further review of the site for hazardous material storage, superficial staining or discoloration, debris, stressed vegetation, or other conditions that may be indicative to potential sources of groundwater or soil contamination, future on-site development facilitated by the proposed project would have potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment.

In addition, because the ages of the existing on-site buildings and structures are currently unknown, the potential exists for the buildings and structures to contain hazardous materials. As such, future on-site development, including potential renovation and demolition of the existing on-site buildings and structures, could expose construction personnel or nearby receptors to hazardous materials. The primary hazardous materials of concern are asbestos, lead, and polychlorinated biphenyls (PCBs) as discussed below.

Asbestos is the name for a group of naturally occurring silicate minerals that are considered to be "fibrous" and, through processing, can be separated into smaller and smaller fibers. The fibers are strong, durable, chemical resistant, and resistant to heat and fire. They are also long, thin, and flexible, such that they can be woven into cloth. Because of the above qualities, asbestos was considered an ideal product and has been used in thousands of consumer, industrial, maritime, automotive, scientific, and building products. However, later discoveries found that, when inhaled, the material caused serious illness.

For buildings constructed prior to 1980, the Code of Federal Regulations (29 CFR 1926.1101) states that all thermal system insulation (boiler insulation, pipe lagging, and related materials) and surface materials must be designated as "presumed asbestos-containing material" unless proven otherwise through sampling in accordance with the

standards of the Asbestos Hazard Emergency Response Act. As noted previously, the ages of the existing on-site buildings and structures are currently unknown. As such, the potential exists for the on-site buildings and structures to have been constructed prior to 1980. In addition, because the proposed project does not include any site-specific development plans, designs, or proposals at this time, the potential exists for future on-site development to include improvements to or demolition of the existing on-site buildings and structures. Given that the ages of the on-site buildings and structures are currently unknown, the possibility exists for the buildings and structures to contain asbestos-containing materials that could be released during future development activities. Thus, a significant impact could occur during future development of the project site.

Lead-based paint (LBP) is defined by federal guidelines as any paint, varnish, stain, or other applied coating that has one milligram of lead per square centimeter or greater. Lead is a highly toxic material that may cause a range of serious illnesses, and in some cases death. Structures built prior to 1978, and especially prior to the 1960s, are expected to contain LBP. As noted above, the ages of the existing on-site buildings and structures are currently unknown and therefore have the potential to have been constructed prior to 1978 and include LBP. In addition, because the proposed project does not include any site-specific development plans, designs, or proposals at this time, the potential exists for future on-site development to include improvements to or demolition of the existing on-site buildings and structures. As such, future on-site development, including improvements to or demolition of the on-site buildings and structures could potentially result in exposure to LBP, and a significant impact could occur during future development of the project site.

Furthermore, caulk containing PCBs was commonly used in building construction practices between 1950 and 1970 and, thus, may be present in the existing on-site buildings and structures. Finally, the existing buildings and structures may include items that contain mercury, such as gas pressure regulators or thermostats. Therefore, future on-site development, including improvements to or demolition of the on-site buildings and structures, could present a potential hazard risk related to LBP, asbestos, PCB-containing caulk, or mercury.

Additional site conditions such as old septic tanks or wells also have the potential to result in soil contamination within the project site. If any such soil contamination is present in on-site soils, a potential health hazard could occur.

Conclusion

Based on the above, future development of the project site could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment, and a **potentially significant** impact would occur.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

- IX-1. Prior to commencement of future ground disturbing activities within the project site, the project applicant shall conduct a Phase I Environmental Site Assessment (ESA) for the project site. The Phase I ESA shall include, but not be limited to, a review of federal, State, and local environmental*

databases for the project site and facilities within a mile of the site, a review of historical aerial photographs, and an on-site reconnaissance, as well as determination of the ages of the existing on-site buildings and structures to determine the presence/absence of historic and/or current conditions which could represent potential hazards.

If the Phase I ESA determines that the existing on-site buildings and structures were constructed after 1980, then the existing buildings and structures would not have the potential to contain hazardous building materials, including LBP, asbestos, PCB containing caulk, mercury, or other hazardous substances, and further mitigation would not be required. However, should the Phase I ESA determine that the existing on-site buildings and structures were constructed prior to 1980, the potential exists for the buildings and structures to contain asbestos-containing materials. In addition, should the Phase I ESA determine that the existing on-site buildings and structures were constructed prior to 1978, the potential exists for the buildings and structures to contain LBP. If the Phase I ESA determines that the existing on-site buildings and structures are of sufficient age to contain any hazardous building materials, the project applicant shall be required to implement Mitigation Measure IX-2 of this IS/MND.

Furthermore, if the Phase I ESA identifies any recognized environmental conditions (REC) related to historic and/or current uses that may have impacted soils, a Phase II ESA shall be prepared and submitted to the City of Manteca Development Services Department. If the Development Services Department determines that remediation is necessary based on the results of the Phase II ESA, such remediation shall be completed prior to approval of any improvement plans or any groundbreaking activities in accordance with State and local requirements. Should the project site be referred to an outside agency, such as Department of Toxic Substances Control for oversight, the applicant would need to provide a 'No Further Action' statement or equivalent from the agency.

IX-2.

Prior to issuance of a demolition permit by the City for any on-site buildings or structures, the project applicant shall provide a site assessment that determines whether any structures to be demolished contain lead-based paint, asbestos, PCB containing caulk, mercury, or other hazardous substances. If structures do not contain any hazardous substances, further mitigation is not required.

If lead-based paint is found, all loose and peeling paint shall be removed and disposed of by a licensed and certified lead paint removal contractor, in accordance with federal, State, and local regulations. The demolition contractor shall be informed that all paint on the buildings shall be considered as containing lead.

If any structures contain asbestos, the demolition or remodeling of any structure may be subject to the National Emission Standard for Hazardous Air Pollutants (NESHAPS) for Asbestos which may include inspection for the presence of asbestos by a certified asbestos inspector and mediation or removal of asbestos materials prior to demolition activity. The inspection

results shall be submitted to the SJVAPCD and City of Manteca Development Services Department.

If any structures contain PCB containing caulk, mercury, or other hazardous substance, the applicant for the demolition permit shall prepare and implement an abatement plan consistent with federal, State, and local standards, subject to approval by the SJVAPCD and City of Manteca Development Services Department.

The contractor shall take appropriate precautions to protect his/her workers, the surrounding community, and to dispose of construction waste in accordance with federal, State, and local regulations subject to approval by the SJVAPCD and City of Manteca Development Services Department.

- c. The nearest school, Sierra High School, is located approximately 0.5-mile southeast of the project site. Therefore, the proposed project would result in **no impact** related to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- d. The California Environmental Protection Agency (Cal EPA) has compiled a list of data resources that provide information regarding the facilities or sites identified as meeting the “Cortese List” requirements, pursuant to Government Code 65962.5. The components of the Cortese List include the Department of Toxic Substances Control (DTSC) Hazardous Waste and Substances Site List,¹⁹ the list of leaking underground storage tank (LUST) sites from the State Water Resources Control Board (SWRCB’s) GeoTracker database,²⁰ the list of solid waste disposal sites identified by the SWRCB, and the list of active Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO) from the SWRCB.²¹

The project site is not included on the DTSC Hazardous Waste and Substances Site List, SWRCB’s list of solid waste disposal sites, list of LUST sites, or list of active CDO and CAO. Therefore, the proposed project would not create a significant hazard to the public or the environment related to being located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5, and a **less-than-significant** impact would occur.

- e. The nearest airport to the project site is the Stockton Metropolitan Airport, which is located approximately 6.3 miles north of the project site. As such, the project site is not located within two miles of any public airports or private airstrips, and does not fall within an airport land use plan area. Therefore, **no impact** related to a safety hazard for people residing or working in the project area related to such would occur.
- f. In February 2022, the San Joaquin County Board of Supervisors adopted an Emergency Operations Plan (EOP).²² The primary purpose of the EOP is to outline the County’s all-

¹⁹ Department of Toxic Substances Control. *Hazardous Waste and Substances Site List (Cortese)*. Available at: <https://www.envirostor.dtsc.ca.gov/public/>. Accessed December 2025.

²⁰ State Water Resources Control Board. *GeoTracker*. Available at: <https://geotracker.waterboards.ca.gov/map/?myaddress=California&from=header&cqid=8858350455>. Accessed January 2026.

²¹ CalEPA. *Cortese List Data Resources*. Available at: <https://calepa.ca.gov/sitecleanup/corteselist/>. Accessed January 2026.

²² San Joaquin County. *County of San Joaquin Emergency Operations Plan*. February 17, 2022.

hazard approach to emergency operations to protect the safety, health, and welfare of its citizens throughout all emergency management mission areas. Per the City's General Plan, the project site is currently designated as I, CMU, PQP, and MDR, and the site is zoned PD, R2, M1, and CMU. The proposed project would require the approval of a GPA and rezone to designate and zone the site as CMU. However, because the proposed land use designation would be similar to the existing land use designations of the site, the impacts have already been generally anticipated by the City, and the proposed project would not physically interfere with the EOP. Specifically, the effects on emergency evacuation associated with development of the site have been generally anticipated by the City and analyzed in the General Plan EIR. The General Plan EIR concluded that, with implementation of General Plan policies and actions, buildout of the City, including the project site, would result in a less-than-significant impact related to conflicting with evacuation routes in the event of an emergency. In addition, the site is currently developed with a mix of commercial and residential uses. Thus, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and a **less-than-significant** impact would occur.

- g. Issues related to wildfire hazards are discussed in Section XX, Wildfire, of this IS/MND. As noted therein, the project site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ).²³ In addition, the project site is located within an urbanized area of the City of Manteca and is generally bordered by existing development. The developed nature of the area surrounding the project site would help to prevent the spread of wildfire to the site. Thus, the potential for wildland fires to reach the project site would be relatively limited. The proposed project would not expose people or structures to the risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, and a **less-than-significant** impact would occur.

²³ California Department of Forestry and Fire Protection. *Fire Hazard Severity Zone Viewer*. Available at: <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>. Accessed December 2025.

X. HYDROLOGY AND WATER QUALITY.

Would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>

Discussion

- a. The following discussion provides a summary of the proposed project’s potential to violate water quality standards/waste discharge requirements or otherwise degrade water quality during construction and operation.

Construction

The proposed project does not include any site-specific development plans, designs, or proposals at this time. However, the proposed project could allow for future development of the project site. Future construction activities would likely include grading and vegetation removal, which may increase soil erosion rates and loss of topsoil on-site. Grading operations may impact the surface runoff by increasing the amount of silt and debris carried by runoff. In addition, refueling and parking of construction equipment and other vehicles on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the City’s storm drains. Improper handling, storage, or disposal of fuels and materials or improper cleaning of machinery close to area waterways could cause water quality degradation. However, the City’s National Pollutant Discharge Elimination System (NPDES) Phase II Small Municipal Separate Storm Sewer System (MS4) stormwater permit would require future applicants to show proof of coverage under the State’s General Construction Permit prior to receipt of any construction permits. The State’s General Construction Permit requires that subject projects must file a Notice of Intent with the SWRCB and develop a site-specific Storm

Water Pollution Prevention Plan (SWPPP). A SWPPP describes Best Management Practices (BMPs) to control or minimize pollutants from entering stormwater and must address both grading/erosion impacts and non-point source pollution impacts of the development project. Waste and materials management BMPs include implementing practices and procedures to prevent pollution from materials used on construction sites. BMPs include, but are not limited to, tracking controls, perimeter sediment controls, drain inlet protection, wind erosion/dust controls, and waste management control. In addition, a Qualified SWPPP Practitioner (QSP) would ensure compliance with the SWPPP through regular monitoring and visual inspections during construction activities. The QSP for the project would amend the SWPPP and revise project BMPs, as determined necessary through field inspections, to protect against substantial erosion or siltation on- or off-site.

Operation

The proposed project would include a GPA to change the land use designation of the project site from I, CMU, PQP, and MDR to CMU and does not include any site-specific development plans, designs, or proposals at this time. The proposed CMU land use designation would provide for future development of the project site with commercial and residential uses.

Future development of the site would include the addition of new impervious surfaces on the site that would result in the generation of urban runoff, which could contain pollutants if the runoff comes into contact with vehicle fluids on parking surfaces and/or landscape fertilizers and herbicides. However, the final design of future drainage systems would be required to be reviewed and approved by the City of Manteca, which would ensure that future drainage system comply with all applicable regional and local standards, including those set forth in the City's Municipal Code, as well as requirements to incorporate sufficient permanent stormwater treatment control BMPs.

Furthermore, future development of the project site would be designed in accordance with the requirements established by the City's NPDES Phase II MS4 stormwater permit. Therefore, during operation, future projects would comply with all relevant water quality standards and waste discharge requirements, and would not degrade water quality.

Conclusion

Based on the above, the proposed project and future development of the project site would not include land uses typically associated with the generation or discharge of polluted water, and would be designed to adequately treat stormwater runoff from the site prior to discharge. In addition, compliance with the required SWPPP would ensure that water quality impacts do not occur during future construction activities. Therefore, a ***less-than-significant*** impact related to water quality and waste discharge requirements could occur.

- b,e. The City of Manteca is located in the Eastern San Joaquin County Groundwater Basin (ESJCGB), which is a subbasin of the San Joaquin Valley Groundwater Basin. Groundwater recharge occurring in the area comes from irrigation of agricultural lands surrounding the City and infiltration from streams flowing west out of the Sierra Nevada. Recharge occurs in areas with permeable materials which allow the infiltration of water along streams, alluvial fans and foothill areas. According to the General Plan EIR, groundwater recharge occurring in the planning area comes from irrigation of agricultural lands surrounding the City and infiltration from streams flowing west out of the Sierra Nevada. According to the City's Urban Water Management Plan (UWMP), in order to

reduce dependence on groundwater and ensure sustainable yields, the City's goal is to achieve a 53 percent to 47 percent annual balance of surface water to groundwater, respectively. The combined use of surface water, purchased from the South San Joaquin Irrigation District (SSJID), and groundwater by the City is intended to reduce groundwater withdrawal to an established sustainable yield of one acre-foot per year per acre (AFY/ac). The resulting reduction in groundwater withdrawal has stabilized groundwater levels in the Manteca area. As buildout of the planning area continues over time, groundwater pumping would remain limited, and projected future water demands would be met by a combination of groundwater, imported water, and recycled water.

The proposed project does not include any site-specific development plans, designs, or proposals at this time. Thus, the proposed project would not directly result in the use of groundwater. The majority of the site is currently unpaved and consists of pervious surfaces. The proposed project could allow for the future development of impervious surfaces within the project site, which would result in decreased percolation of stormwater within developed areas of the site. However, the project site constitutes a relatively small area compared to the size of the ESJCGB, and, thus, does not constitute a substantial source of groundwater recharge. Furthermore, future development would be anticipated to allow for some continued infiltration on-site through unpaved/landscaped areas of the site. As such, the proposed project would not substantially interfere with groundwater recharge.

In addition, as detailed in Section XIX, Utilities and Service Systems, of this IS/MND, while future development of the project site could result in an increase in water demand of approximately 10.22 AFY beyond what was analyzed for the project site in the General Plan EIR, the City of Manteca would maintain a water supply surplus of 3,957 to 6,786 AFY. Therefore, the City would have adequate water supplies to accommodate future development of the project site as provided by the proposed project.

Therefore, the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the ESJCGB. Thus, a ***less-than-significant*** impact would occur.

- ci-iii. The proposed project would allow for potential future development on the project site. Such development would likely involve the creation of new impervious surfaces, which would alter the existing drainage patterns of the site. However, the proposed project does not involve any site-specific proposals for physical development at this time. In addition, all future on-site development facilitated by the proposed project would be subject to General Plan policies and Municipal Code standards, such as General Plan Policy CF-8.2, which requires the preparation of detailed project specific floodplain and drainage studies, and Municipal Code Section 17.48.040(1) related to runoff management and infiltration. In addition, future development of the project site would be designed in accordance with requirements established by the City's NPDES Phase II MS4 stormwater permit. Furthermore, future development of the project site would be required to comply with Chapter 13.28, Stormwater Management and Discharges, of the City's Municipal Code, including Section 13.28.070 which establishes requirements to prevent, control, and reduce stormwater pollutants, including eroded soils. As such, the proposed project and future development of the project site would not substantially alter the existing drainage pattern of the site or area in a manner which would result in erosion, siltation, or flooding on- or off-site, create or contribute runoff water which would exceed the capacity

of existing or planned stormwater drainage systems, or provide substantial additional sources of polluted runoff. Consequently, implementation of the proposed project would result in a ***less-than-significant*** impact.

- civ. According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) number 06077C0620F, the majority of the project site lies within Flood Zone X, which is defined as areas with 0.2 percent annual chance flood hazard.²⁴ According to FEMA FIRM 06077C0620F, a small area within the western portion of the project site lies within Flood Zone X, which is defined as areas with reduced flood risk due to levee. Zone X is not considered a Special Flood Hazard Area. As such, the proposed project would not impede or redirect flood flows, and a ***less-than-significant*** impact would result.
- d. Impacts related to development within a flood hazard zone are discussed under Question 'civ', above. Tsunamis are defined as sea waves created by undersea fault movement, whereas a seiche is a long-wavelength, large-scale wave action set up in a closed body of water such as a lake or reservoir. The project site is not located within the vicinity of an ocean or a large closed body of water. Thus, the project site would not be exposed to flooding risks associated with tsunamis or seiches, and ***no impact*** would occur.

²⁴ Federal Emergency Management Agency. *Flood Insurance Rate Map 06077C0620F*. Effective October 16, 2009.

XI. LAND USE AND PLANNING.

Would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>

Discussion

- a. A project risks dividing an established community if the project would introduce infrastructure or alter land use so as to change the land use conditions in the surrounding community, or isolate an existing land use. The proposed project would include a GPA and rezone, and does not include any site-specific development plans, designs, or proposals at this time. As such, the proposed project would not directly result in any impacts associated with physically dividing an established community. The project site is currently developed with a mix of industrial and commercial uses, as well as single-family residences.

Surrounding existing land uses include commercial uses to the north; commercial uses and single-family residences to the east, agricultural uses to the south; and agricultural uses and the Manteca WWTP plant to the west. Future development of the site with commercial and residential uses, as provided under the CMU land use designation would be generally consistent with the development on-site and in the surrounding area. Furthermore, any future development on the project site facilitated by the proposed project would be required to comply with all applicable General Plan goals and policies, as well as all other federal, State, and local regulations, which would ensure that the physical arrangement of existing land uses within the City would not be disrupted. Future on-site development facilitated by the proposed project would also be subject to Site Plan and Design Review, as established by Municipal Code Section 17.10.060, prior to approval to ensure development is compatible with the surrounding area and consistent with all applicable design standards.

Overall, the project would not alter the general development trends in the area nor isolate an existing land use, and impacts related to physically dividing an established community would be ***less than significant***.

- b. As discussed throughout this IS/MND, the proposed project would not result in any significant environmental effects that cannot be mitigated to a less-than-significant level by the mitigation measures provided herein or through compliance with standard local, State, and federal regulations. In addition, future development occurring pursuant to the proposed GPA and rezone would be required to be consistent with all applicable development standards established in the City's Municipal Code. Furthermore, as described herein, the proposed project and any future associated on-site development would not conflict with City policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including, but not limited to, City policies and guidelines related to the City's noise standards and all applicable State regulations related to stormwater. Thus, a ***less-than-significant*** impact would occur.

XII. MINERAL RESOURCES.

Would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘

Discussion

a,b. As noted in the City’s General Plan EIR, the California Division of Mines and Geology identified one location near the San Joaquin River within the General Plan Study Area as Zone Mineral Resource Zone 2 (MRZ-2). In addition, Brown Sand and Gravel, Incorporated, has produced processed sand at Oakwood Lake Pit, located within the Study Area, and the General Plan EIR identified one location within the General Plan Study Area as Zone MRZ-3.

However, mining operations in the MRZ-2 zone within the Study Area and at the Oakwood Lake Pit have ceased. Oakwood Lake Resort has been created from the reclaimed mined lands, and a residential project has been approved by San Joaquin County on the site of the former quarry. The majority of the area designated as MRZ-3 runs through the center of the City of Manteca and is currently developed and is not available for mining. Furthermore, the project site is located over two miles east of the former Oakwood Lake Pit mining site. Moreover, the site is currently developed with a mix of industrial and commercial uses, as well as single-family residences, and is not proposed for mining activities. Mining activities would also not be compatible with the existing land uses surrounding the project site. As such, **no impact** to mineral resources would occur.

XIII. NOISE.

Would the project result in:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a. The discussion below presents information regarding sensitive noise receptors in proximity to the project site, applicable noise standards, the existing noise environment, and the potential for the proposed project to result in noise impacts during project construction and operation. The following terms are referenced in the sections below:
- Decibel (dB): A unit of sound energy intensity. An A-weighted decibel (dBA) is a decibel corrected for the variation in frequency response to the typical human ear at commonly encountered noise levels. All references to dB in this discussion will be A-weighted unless noted otherwise.
 - Day-Night Average Level (L_{dn}): The average sound level over a 24-hour period, with a penalty of 10 dB applied to noise occurring during nighttime hours (10:00 PM to 7:00 AM).
 - Community Noise Equivalent Level (CNEL): The average sound level over a 24-hour period, with a penalty of five dB applied to noise occurring during daytime hours (7:00 AM to 10:00 PM) and a penalty of 10dB applied to noise occurring during nighttime hours (10:00 PM to 7:00 AM).
 - Equivalent Sound Level (L_{eq}): The average sound level over a given time-period.
 - Maximum Sound Level (L_{max}): The maximum sound level over a given time period.

Sensitive Noise Receptors

Some land uses are considered more sensitive to noise than others, and, thus, are referred to as sensitive noise receptors. Land uses often associated with sensitive noise receptors generally include residences, schools, libraries, hospitals, and passive recreational areas. Noise sensitive land uses are typically given special attention in order to achieve protection from excessive noise. The nearest sensitive receptors to the project site are the residences located approximately 190 feet east of the project site.

City Noise Standards

Section 17.58.050(D) of the Manteca Municipal Code exempts noise sources associated with construction activities when constructed as part of an approved building permit, except as prohibited in Section 17.58.050(E)(1), which prohibits construction noise daily between the hours of 7:00 PM and 7:00 AM. In addition, Municipal Code Section 9.52.040 prohibits the use of any construction equipment between the hours of 8:00 PM and 7:00 AM.

The Noise Element of the General Plan contains policies to “to mitigate the effects of increased noise levels in excess of established standard.” Table 7 presents the maximum allowable noise levels per land use, as determined in the City of Manteca General Plan EIR. The City of Manteca uses the CBSC which establishes that “Interior community noise levels (CNEL) with windows closed, attributable to exterior sources, shall not exceed an annual CNEL or L_{dn} of 45 dB in any habitable room.”

Table 7 Maximum Permissible Sound Pressure Levels, City of Manteca		
Receiving Land Use Category	Maximum Allowable Noise Levels	
	Time Interval	Exterior Noise dB(A)
Single and Limited Multiple Family Residential	10 PM to 7 AM	50
	7 AM – 10 PM	60
Multiple Family, Public Institutional, & Neighborhood Commercial	10 PM to 7 AM.	55
	7 AM – 10 PM.	60
Medium & Heavy Commercial	10 PM to 7 AM.	60
	7 AM – 10 PM.	65
Light Industrial	Anytime	70
Heavy Industrial	Anytime	75

Source: City of Manteca General Plan EIR, Table 3.12-10. November 2022.

The City of Manteca does not currently have a policy for assessing noise impacts associated with increases in ambient noise levels from project-generated noise sources. As a result, the noise criteria developed by the Federal Interagency Commission on Noise (FICON) was applied to the project, as is the industry standard. Table 8 presents the FICON significance thresholds that are used for analyzing changes in cumulative noise levels.

Table 8 Significance of Changes in Cumulative Noise Exposure	
Ambient Noise Level Without Project	Increase Required for Significant Impact
< 60 dB	5.0 dB, or greater
60 to 65 dB	3.0 dB, or greater
> 65 dB	1.5 dB, or greater

Source: Federal Interagency Committee on Noise (FICON).

Project Construction Noise

The proposed project would include a GPA and rezone, and does not include any specific development plans, designs, or proposals. Nonetheless, future development of the project site could include the use of heavy equipment for grading, excavation, paving, and building construction, which could result in temporary noise level increases at nearby sensitive receptors. Noise levels would vary depending on the type of equipment used, how the equipment is operated, and how well the equipment is maintained. In addition, noise exposure at any single point outside the project site would vary depending on the proximity of construction activities to that point. Standard construction equipment, such as backhoes, loaders, and trucks, would be used on-site.

Table 9 shows maximum noise levels associated with typical construction equipment. Based on the table, activities involved in typical construction would generate maximum noise levels up to 90 dB at a distance of 50 feet. As one increases the distance between equipment, or increases separation of areas with simultaneous construction activity, dispersion and distance attenuation reduce the effects of combining separate noise sources. The noise levels from a source decrease at a rate of approximately 6.0 dB per every doubling of distance from the noise source. As noted above, the nearest noise sensitive receptors are located approximately 190 feet east of the site, Thus, based on the typical construction equipment noise presented in Table 9, noise levels at the nearest receptor are anticipated to be approximately 78.4 dB.

Table 9 Construction Equipment Noise	
Type of Equipment	Maximum Level, dB at 50 feet
Auger Drill	84
Backhoe	78
Compactor	83
Compressor (air)	78
Concrete Saw	90
Dozer	82
Dump Truck	76
Excavator	81
Generator	81
Jackhammer	89
Pneumatic Tools	85

Source: Federal Highway Administration, Roadway Construction Noise Model User's Guide, January 2006.

Noise would also be generated during future construction activities by increased truck traffic on area roadways associated with the transport of heavy materials and equipment to and from the project site. However, future construction traffic noise increases would be of short duration and would likely occur primarily during daytime hours.

As noted above, construction activities are exempt from the City's Noise Ordinance during allowable hours. In addition, the proposed project would be required to comply with the requirements of Section 17.58.050 the City's Municipal Code, and construction activities would occur only during the permitted hours of 7:00 AM to 7:00 PM. However, as discussed above, the nearest noise sensitive receptors could be exposed to noise levels of approximately 74.8 dB due to on-site construction activities, which could be considered a substantial temporary increase in ambient noise levels in the project vicinity. Thus, temporary noise increases associated with construction activities, such as noise from internal combustion engines and construction equipment, including generators and air compressors, could be potentially significant.

Operational Noise

The proposed project does not include any site-specific development plans, designs, or proposals at this time. Thus, implementation of the proposed project would not directly result in the generation of increased noise levels within the City, and would not expose sensitive receptors to excess noise levels. However, the proposed project would allow for the future development of commercial and residential uses on the project site. Noise

generated during operations of such future development would be limited to commercial noise, residential noise, and traffic noise, as discussed in further detail below.

Commercial Noise

The primary noise sources associated with commercial operations on the project site would be delivery truck circulation, truck delivery activities, and building mechanical equipment (heating, ventilation, and air conditioning [HVAC]). Future operational noise associated with commercial development on the project site is anticipated to be consistent with the adjacent existing commercial uses in the project vicinity. However, the proposed GPA would provide for future development of the project site with up to 228,887.9 sf of additional commercial uses²⁵ than previously anticipated by the City for the project site. As such, future development of the project site could result in an operational noise level increase beyond what was previously anticipated for the site in the General Plan EIR. In addition, given that site-specific development plans, designs, or proposals have not been prepared for the project site, the potential exists that future on-site commercial uses could result in the generation of a substantial permanent increase in ambient noise levels in excess of standards established in the City's General Plan and the Municipal Code. Therefore, a potentially significant impact would occur with regard to on-site operational commercial noise.

Residential Noise

Residential uses do not typically involve generation of substantial on-site noise level increases; rather, the primary noise source associated with residential development is traffic noise. Future operation of the proposed project would include typical residential noise, similar to the existing on-site residences. However, as discussed throughout this IS/MND, the proposed GPA would provide for future development of the project site with 390 additional residential units²⁶ than was previously anticipated for the site by the City. Therefore, future development of the project site could result in an operational ambient noise level increase beyond what was previously anticipated for the site in the General Plan EIR. In addition, given that site-specific development plans, designs, or proposals have not been prepared for the project site, the potential exists that future on-site residential uses could result in the generation of a substantial permanent increase in ambient noise levels in excess of standards established in the City's General Plan and the Municipal Code. Therefore, a potentially significant impact would occur with regard to on-site operational residential noise.

Traffic Noise

As discussed above, the proposed GPA could result in future development of the project site with up to 228,690 sf of additional commercial uses and 390 additional residential units than what was previously anticipated for the site by the City. As such, future

²⁵ Under existing conditions, the project site could be developed with up to 21,453.3 sf of commercial uses (1.97 acres CMU x 0.25 commercial uses x 43,560 sf/acre x 1.0 FAR). Under the proposed conditions, the project site could be developed with up to 251,341.2 sf of commercial uses (23.08 acres CMU x 0.25 commercial uses x 43,560 sf/acre x 1.0 FAR). The proposed project would result in a net increase of up to 228,887.9 sf of commercial uses within the project site (251,341.2 sf – 21,435.2 sf).

²⁶ Under existing conditions, the project site could be developed with up to 129 residential units (4.27 acres MDR x 20 du/ac] + [1.97 acres CMU x 0.75 residential uses x 30 du/ac]). Under the proposed conditions, the project site could be developed with up to 519 residential units (23.08 acres CMU x 0.75 residential uses x 30 du/ac). The proposed project would result in a net increase of up to 390 residential units within the project site (519 residential units – 129 residential units).

development of the project site could result in a traffic noise level increase beyond what was previously anticipated for the site.

According to the General Plan EIR, the existing traffic noise level along West Yosemite Avenue in the project vicinity is 71.2 dB. As such, the General Plan EIR determined that a traffic noise level increase of 1.5 dB within the project vicinity would be considered significant. Generally, a doubling in traffic volumes would result in a traffic noise level increase of 3.0 dB. As shown in Figure 3.14-3 of the General Plan EIR, the existing average daily traffic volume along West Yosemite Avenue in the project vicinity is approximately 11,600 trips per day. According to the Transportation Assessment prepared for the proposed project by Fehr and Peers, future development of the project site could generate approximately 11,132 additional vehicle trips within the project vicinity. As such, the proposed project would nearly double traffic volumes within the project vicinity and would result in a traffic noise level increase of greater than 1.5 dB. Therefore, the proposed project could result in a potentially significant increase in traffic noise levels within the project vicinity. It should be noted that the General Plan EIR determined that impacts related to increases in traffic noise levels would be significant and unavoidable. As such, although the proposed project could result in a potentially significant increase in traffic noise levels within the project vicinity, the proposed project would not increase the significance of impacts related to traffic noise within the General Plan planning area.

Conclusion

Based on the above, future on-site development facilitated by the proposed project has the potential to result in substantial noise increases in the project area during construction and operations. Thus, a **potentially significant** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above impact to a *less-than-significant* level.

XIII-1. In conjunction with submittal of any future development proposals on-site, a project-level noise assessment shall be prepared by a qualified acoustic engineer demonstrating that construction and operational noise levels (including traffic noise levels) associated with future on-site development would meet the applicable City of Manteca exterior noise standards, and, if necessary, provide recommended mitigation measures, that may include, but shall not be limited to, the use of sound walls or other noise reducing measures at the project site, installation of quiet pavement, and installation of parapets for future HVAC equipment. The noise assessment shall be submitted to the City of Manteca Development Services Department for review and approval, and the recommendations shall be shown on all project plans, subject to review and approval by the City Engineer.

- b. Similar to noise, vibration involves a source, a transmission path, and a receiver. However, noise is generally considered to be pressure waves transmitted through air, whereas vibration usually consists of the excitation of a structure or surface. As with noise, vibration consists of an amplitude and frequency. A person's perception to the vibration depends on their individual sensitivity to vibration, as well as the amplitude and frequency of the source and the response of the system which is vibrating.

Vibration is measured in terms of acceleration, velocity, or displacement. A common practice is to monitor vibration in terms of peak particle velocities (PPV) in inches per second (in/sec). Standards pertaining to perception, as well as damage to structures, have been developed for vibration levels defined in terms of PPV. Human and structural response to different vibration levels is influenced by a number of factors, including ground type, distance between source and receptor, duration, and the number of perceived vibration events. According to Caltrans, the threshold for architectural damage to structures is 0.20 in/sec PPV and continuous vibrations of 0.10 in/sec PPV, or greater, would likely cause annoyance to sensitive receptors.

As discussed above, the proposed project does not include any site-specific development plans, designs, or proposals at this time. Thus, implementation of the proposed project would not directly result in the generation of increased vibration levels within the City.

Nonetheless, future on-site development facilitated by the proposed project would result in increased vibration levels in the immediate project vicinity. However, construction activities would be temporary in nature and are anticipated to occur during normal daytime working hours. Because the proposed project would not cause continuous, long-term vibrations, the project would not be expected to result in extended annoyance to sensitive receptors located in proximity to the project site.

The primary vibration-generating activities associated with the proposed project would likely occur during future grading, placement of utilities, and construction of buildings. Typical vibration levels produced by construction equipment at 50 feet are generally below Caltrans' threshold for damage to residential structures (0.20 in/sec PPV) or Caltrans' threshold for annoyance (0.1 in/sec PPV). The nearest sensitive receptor within the project area is located approximately 190 feet from the nearest project site boundary. Therefore, sensitive receptors would be located farther than 50 feet away from any construction activities that would occur within the project site, ensuring that any future construction does not exceed Caltrans' threshold for damage to residential structures (0.20 in/sec PPV) or Caltrans' threshold for annoyance (0.1 in/sec PPV).

Therefore, the proposed project would not result in the generation of excessive groundborne vibration or groundborne noise levels, and a **less-than-significant** impact would occur.

- c. The nearest airport to the site is the Stockton Metropolitan Airport, located approximately 6.3 miles north of the site. Given the substantial distance between the airport and the project site, noise levels resulting from aircraft at the nearest airport would be negligible at the site. Given that the project site is not located within two miles of a public airport or public use airport, the proposed project would not expose people residing or working in the project area to excessive noise levels associated with such. Thus, **no impact** would occur.

XIV. POPULATION AND HOUSING.

Would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>

Discussion

a. The proposed project would include a GPA and rezone, and does not include any site-specific development plans, designs, or proposals at this time. Under the proposed CMU land use designation, future development of the project site could result in increased population growth than was previously analyzed in the General Plan EIR. Under the existing land use designations, the project site could be developed with a maximum of 129 residential units. According to the U.S. Census Bureau, the average household size in Manteca was estimated at 3.19 persons per household.²⁷ Using this average household size, development of the project site under existing conditions would result in an estimated population of 411 residents (129 units x 3.19 persons per household). However, under the proposed CMU land use designation, the project site could be developed with a maximum of 519 residential units, which would result in an estimated population of 1,655 residents (519 units x 3.19 persons per household). As such, the proposed project could result in an increase of 1,244 residents beyond what was previously anticipated for the site. According to the U.S. Census Bureau, the entire City has an estimated total population of 94,292.²⁸ The estimated additional 1,244 residents would equate to approximately 1.3 percent of the entire City’s population. Such an increase would not be considered substantial unplanned population growth. In addition, the future development of residential housing units would add to the housing stock in the City of Manteca. Furthermore, as discussed in Section XIX, Utilities and Services Systems, of this IS/MND, adequate utility infrastructure and services exist to meet the additional demand that would be created by future development of the project site. Similarly, as discussed in Section XV, Public Services, public service providers, such as local police and fire departments, would be capable of accommodating the demands of future development.

Therefore, the proposed project and future development of the project site would not induce substantial unplanned population growth either directly or indirectly, and a **less-than-significant** impact would occur.

b. Several existing residential units are currently located on-site. However, the residential units represent a very small fraction of the existing housing market in the City and surrounding area, and do not represent a substantial number of people or housing. The proposed project does not include any site-specific development plans, designs, or proposals at this time. Thus, implementation of the proposed project would not directly result in the demolition of the on-site residences. However, if future development of the

²⁷ U.S. Census Bureau. *QuickFacts: Manteca city, California.* Available at: <https://www.census.gov/quickfacts/fact/table/mantecacitycalifornia/PST045224>. Accessed December 2025.

²⁸ *Ibid.*

project site would require the demolition of the existing residences, the assumption can be made that new housing could be found within the City's existing housing supply, as well as on-site, given the proposed CMU land use designation is anticipated to result in future development of the site with residential uses. As such, the proposed project would not result in the displacement of a substantial amount of existing housing or people and would not necessitate the construction of replacement housing elsewhere. Therefore, **a less-than-significant** impact would occur.

XV. PUBLIC SERVICES.

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

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a,b,e. Fire protection for the City of Manteca is provided by the Manteca Fire Department (MFD). MFD’s main functions are to provide fire prevention, organized and efficient response to fires, first response to hazardous materials incidents, basic level "first responder" medical response, and public fire education. The MFD serves approximately 94,292 residents throughout approximately 17 square miles within the City limits. The nearest MFD station, Fire Station No. 2, located at 1154 Union Road, is approximately 1.8-miles southeast of the project site. The existing goal is to maintain as average five-minute response time for all emergencies, and engine and ladder companies should be staffed with a minimum of three personnel.

Police protection services within the City of Manteca are provided by the Manteca Police Department (MPD). As noted in the General Plan EIR, the MPD is a full-service municipal law enforcement agency with specialized assignments and recognized specialties. The MPD is headquartered at 1001 West Center Street, which is located approximately 1.3 miles east of the project site. According to the General Plan EIR, the City meets their service standard of one sworn officer per 1,000 residents.

The proposed project would include a GPA and rezone, and does not include any site-specific development plans, designs, or proposals at this time. As discussed in Section XIV, Population and Housing, above, future development of the project site could result in an estimated population of up to 1,655 residents, which would equate to approximately 1.3 percent of the entire City’s population. Therefore, some increase in demand for fire and law enforcement services, as well as other public facilities, could occur as a result of the increase in population associated with future development of the project site. However, increased demand alone is not the relevant inquiry under CEQA, nor is the need for additional staff and/or equipment. The relevant inquiry, as confirmed by the courts (see *City of Hayward v. Board of Trustees of the California State University*) is whether a significant effect on the environment would occur in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services as a result of the increased demand.

The proposed project would require the approval of a GPA to designate the site as CMU and does not include any specific development plans, designs, or proposals. In addition, future on-site development facilitated by the proposed project would be subject to payment of fire prevention fees in accordance with Chapter XI, Fire Prevention Fees, of the City’s

Municipal Code, which are used to pay for costs associated with development of new fire stations. Furthermore, the future on-site residences would be constructed in accordance with the fire protection requirements of the most recent California Fire Code.

Based on the above, the proposed project would result in a **less-than-significant** impact related to the need for new or physically altered fire protection, police protection, or other public facilities, the construction of which could cause significant environmental impacts.

- c. The City of Manteca is served by the Manteca Unified School District (MUSD), which operates 22 schools ranging from Kindergarten through High School; education facilities include 12 elementary schools, four high schools, one adult education school, and five alternative schools. The proposed project would include a GPA and rezone, and does not include any site-specific development plans, designs, or proposals at this time. However, the proposed project would provide for future development of up to 519 residential units on-site, which could result in an estimated population of up to 1,655 residents. According to the U.S. Census Bureau, as of 2024, children under 18 years old made up approximately 26.1 percent of the total population of Manteca.²⁹ Therefore, the proposed project could increase the amount of school age children in the City by approximately 432 students. However, as discussed above, increased demand alone is not the relevant inquiry under CEQA, nor is the need for additional staff and/or equipment. Rather, the relevant inquiry is whether a significant effect on the environment would occur as a result of the increased demand.

In addition, future on-site development facilitated by the proposed project would be subject to payment of School Impact Mitigation Development Fees to fund local school services. Proposition 1A/SB 50 prohibits local agencies from using the inadequacy of school facilities as a basis for denying or conditioning approvals of any “[...] legislative or adjudicative act...involving ...the planning, use, or development of real property” (Government Code 65996[b]). Satisfaction of the Proposition 1A/SB 50 statutory requirements by a developer is deemed to be “full and complete mitigation.” Furthermore, future on-site development facilitated by the proposed project would be subject to payment of the Manteca Unified School District Residential/Commercial Property Developer fee pursuant to Chapter VI, Development Fees, of the City’s Municipal Code.

Because the project applicant would be required to pay appropriate development fees, the proposed project would have a **less-than-significant** impact related to the need for new or physically altered schools, the construction of which could cause significant environmental impacts.

- d. Issues related to parks and recreation are discussed in further detail in Section XVI, Recreation, below. As noted therein, the proposed project would not include the development of any parkland. The park acreage standard for the City of Manteca is five acres per 1,000 residents. Using the U.S. Census Bureau average household size for the City of Manteca of 3.19 persons per household, under the site’s existing land use designations development of the project site would generate approximately 411 residents, whereas future development of the project site facilitated by the proposed project could generate an estimated 1,655 residents. Therefore, future development of the project site would be required to provide a minimum of 6.18 additional acres of parkland beyond what

²⁹ U.S. Census Bureau. *QuickFacts: Manteca city, California*. Available at: <https://www.census.gov/quickfacts/fact/table/mantecacitycalifornia,US/PST045219>. Accessed December 2025.

has been previously anticipated for the site. Because the proposed project does not include any site-specific development plans, designs, or proposals, the provision of parkland by future on-site development facilitated by the proposed project cannot be determined at this time. However, in the event that future on-site development does not include any parks or recreational facilities, or the future development is determined to be too small to develop adequate parkland, the project applicant would be required to pay a park in-lieu fee, pursuant to Municipal Section 3.20.090. In addition, the General Plan EIR determined that new development within the planning area would be required to pay a park acquisition and improvement fee to fund system-wide improvements. Pursuant to General Plan Policy CF-4.4, payment of the park acquisition and improvement fee is to ensure the City can continue to provide five acres of parkland per 1,000 residents. Therefore, the proposed project would result in a ***less-than-significant*** impact related to the need for new or physically altered parks, the construction of which could cause significant environmental impacts.

XVI. RECREATION.

Would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>

Discussion

a,b. The proposed project would include a GPA and rezone, and does not include any site-specific development plans, designs, or proposals at this time. Therefore, implementation of the proposed project would not directly increase demand for recreational facilities. While the proposed project would not directly result in increased demand for recreational facilities relative to existing conditions, approval of the proposed project could result in reasonably foreseeable future development of the site, and additional demand for recreational facilities may occur.

While the proposed project would not include development of any parks or recreational facilities, future on-site development facilitated by the project could include parks or other recreational facilities. According to the City of Manteca PRMP, as of 2016, the City managed more than 483 acres of parks, facilities, trails, and recreation lands. The park acreage standard for the City of Manteca is five acres per 1,000 residents. Although the proposed project does not include any site-specific development plans, designs, or proposals, using the U.S. Census Bureau average household size for the City of Manteca of 3.19 persons per household, under the site’s existing land use designations the development of the project site would generate approximately 411 residents, whereas future development of the project site facilitated by the proposed project could generate an estimated 1,655 residents. Therefore, future development of the project site would be required to provide a minimum of 6.18 additional acres of parkland beyond what has been previously anticipated for the site. Given that the proposed project does not include any site-specific development plans, designs, or proposals, the provision of parkland by future on-site development facilitated by the proposed project cannot be determined at this time. However, in the event that future on-site development does not include any parks or recreational facilities, or the future development is determined to be too small to develop adequate parkland, the project applicant would be required to pay a park in-lieu fee, pursuant to Municipal Section 3.20.090. In addition, according to the General Plan EIR, new development within the planning area would be required to pay a park acquisition and improvement fee to fund system-wide improvements. Pursuant to General Plan Policy CF-4.4, payment of the park acquisition and improvement fee is to ensure the City can continue to provide five acres of parkland per 1,000 residents.

Based on the above, the proposed project would not result in the increased use of existing recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated, nor would the proposed project include or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Thus, a **less-than-significant** impact would occur.

XVII. TRANSPORTATION.

Would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a. The law has changed with respect to how transportation-related impacts may be addressed under CEQA. Traditionally, lead agencies used LOS to assess the significance of such impacts, with greater levels of congestion considered to be more significant than lesser levels. Mitigation measures typically took the form of capacity-increasing improvements, which often had their own environmental impacts (e.g., to biological resources). Depending on circumstances, and an agency’s tolerance for congestion (e.g., as reflected in its general plan), LOS D, E, or F often represented significant environmental effects. In 2013, however, the Legislature passed legislation with the intention of ultimately doing away with LOS in most instances as a basis for environmental analysis under CEQA. Enacted as part of SB 743 (2013), PRC Section 21099, subdivision (b)(1), directed the Governor’s Office of Land Use and Climate Innovation (LCI) to prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed CEQA Guidelines addressing “criteria for determining the significance of transportation impacts of projects within transit priority areas. Those criteria shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. In developing the criteria, [LCI] shall recommend potential metrics to measure transportation impacts that may include, but are not limited to, vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated. The office may also establish criteria for models used to analyze transportation impacts to ensure the models are accurate, reliable, and consistent with the intent of this section.”

CEQA Guidelines Section 21099(b)(2) further provides that “[u]pon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion *shall not be considered a significant impact on the environment* pursuant to [CEQA], except in locations specifically identified in the guidelines, if any.” (Italics added.)

Pursuant to SB 743, the Natural Resources Agency promulgated CEQA Guidelines Section 15064.3 in late 2018, which became effective in early 2019. Subdivision (a) of that section provides that “[g]enerally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, ‘vehicle miles traveled’ refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel.

Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact."³⁰

Please refer to Question 'b' for a discussion of VMT. In addition, further information regarding intersection delay at the intersections surrounding the project site as it relates to site access and circulation is provided in Question 'c,d', below.

The following discussion is primarily based on a Transportation Assessment prepared for the proposed project by Fehr and Peers (see Appendix B).³¹

Pedestrian, Bicycle, and Transit Facilities

The City of Manteca maintains four classes of bicycle facilities (Class I, Class II, Class III, and Class IV). According to the City of Manteca Active Transportation Plan (ATP), 10.3 miles of shared-use paths, 45.2 miles of streets with bicycle facilities, and 557.1 miles of sidewalks currently exist within Manteca.³² Pedestrian facilities do not currently exist within the vicinity of the project site. The nearest bicycle facility is a Class II bicycle lane which extends east from Saint Dominics Drive along West Yosemite Avenue, approximately 0.5-mile from the eastern boundary of the project site. However, a Class IV separated bikeway is being proposed as part of the City's ATP which would extend the existing infrastructure along West Yosemite Avenue including the project frontage.³³ In addition, a Class II buffered bicycle lane is being proposed along South Airport Boulevard, east of the project site.

Manteca Transit operates a fixed-route and Dial-a-Ride bus service with stops throughout the City. Route 1 and Route 4 provide fixed route service to the project area. The nearest stop to the project site is located near the West Yosemite Avenue/Saint Dominics Drive intersection, approximately 0.5-mile east of the project site. In addition to Manteca Transit, the Stanislaus Regional Transit Authority (StanRTA) provides fixed route service between Manteca and the City of Modesto. The StanRTA Lathrop Altamont Corridor Express (ACE) Manteca/Lathrop Station is located approximately 0.35 mile west of the project site. Furthermore, the San Joaquin Regional Transportation District provides both weekday and weekend service to the City of Manteca.

The Transportation Assessment determined that future development of the project site as provided by the proposed GPA would contribute to and increase use of transit, bicycle, and pedestrian facilities in the City. However, future development of the project site is not anticipated to generate transit, bicycle, or pedestrian use that would exceed the capacity of existing facilities in the project area. In addition, the Transportation Assessment concluded that future development of the project site would be required to accommodate construction of standard sidewalks, as well as the planned Class IV separated bikeway along the West Yosemite Avenue frontage of the project site. Furthermore, future development of the project site would be required to adhere to all applicable General Plan goals, policies, and programs, as well as City guidelines, standards, and specifications

³⁰ Subdivision (b)(2) of Section 15064.3 ("transportation projects") provides that "[t]ransportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

³¹ Fehr and Peers. *Yosemite Avenue Mixed Use Conversion GPA – Transportation Assessment*. January 16, 2026.

³² City of Manteca. *City of Manteca Active Transportation Plan* [pg.11]. August 2020.

³³ City of Manteca. *City of Manteca Active Transportation Plan* [pg. 27]. August 2020.

related to the circulation system, including transit, bicycle, or pedestrian facilities. As such, the Transportation Assessment concluded that impacts related to transit, bicycle, and pedestrian facilities and policies associated with the proposed project would be less-than-significant.

Conclusion

Based on the above, a **less-than-significant** impact would occur related to conflicting with a program, plan, ordinance, or policy addressing the circulation system, including transit, bicycle, and pedestrian facilities.

- b. Section 15064.3 of the CEQA Guidelines provides specific considerations for evaluating a project's transportation impacts. Pursuant to Section 15064.3, analysis of VMT attributable to a project is the most appropriate measure of transportation impacts. Other relevant considerations may include the effects of the project on transit and non-motorized travel. The Governor's Office of LCI released *The Technical Advisory on Evaluating Transportation Impacts in CEQA*, which includes screening thresholds to identify when a lead agency may screen out VMT impacts.³⁴ Similar to the LCI Technical Advisory, the City of Manteca SB 743 Implementation Policy identifies different project types that are assumed to cause a less-than-significant transportation impact and, thus, a detailed VMT study is not necessary. Projects that meet the screening criteria include the following:
- **Small projects** – projects that would generate fewer than 1,000 average daily trips if consistent with the General Plan, or 500 daily trips if not consistent.
 - **Affordable housing** – a project that designates units for sale or rent below market rate, and if the units are in an area supported by a quality walking and biking network with nearby retail and employment opportunities.
 - **Local serving uses** – projects that include 125,000 sf or less of retail uses that provide amenities which promote active transportation. Examples include public/quasi-public land uses that support community health, safety, and welfare (e.g., hospitals, police stations, fire stations, community centers, refuse stations, public utilities, neighborhood parks).
 - **Projects located in high-quality transit areas (HQTAs)** – that are within one half mile of the City's Downtown Transit Center or the ACE Manteca/Lathrop station.
 - **Projects located in low VMT areas** – low-VMT transportation analysis zones do not exist within the City of Manteca.

The proposed project does not constitute a small project or include a high percentage of affordable housing units. In addition, the City of Manteca has not developed low VMT areas. However, as previously discussed, the project site is located 0.35-mile east of the ACE Manteca/Lathrop Station. As such, the proposed project would be located within a HQTA and would satisfy the City's VMT screening criteria. Therefore, the Transportation Analysis determined that the proposed project would have a less-than-significant related to VMT, and that further VMT analysis is not required. Thus, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and a **less-than-significant** impact would occur.

- c,d. The proposed project would include a GPA and rezone, and does not include any specific development plans, designs, or proposals. As such, the Transportation Analysis

³⁴ Governor's Office of Land Use and Climate Innovation. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December 2018.

determined that site access and emergency access associated with future development of the site cannot be analyzed at this time. Nonetheless, future development of the project site would be subject to review by the City of Manteca and responsible emergency service agencies, which would ensure that future development be designed in compliance with all applicable emergency access and design standards. In addition, the City would require the preparation of construction management plans that would minimize temporary of traffic obstructions during construction activities.

The Transportation Analysis determined that future development of the project site could increase delays for emergency response vehicles during peak commute hours. However, emergency responders within the City maintain response plans that include use of alternate routes, sirens, and other methods to bypass congestion and minimize response times. In addition, drivers are required by law to yield the right-of-way (ROW) to emergency response vehicles and remain stopped to ensure the safe and timely passage of emergency vehicles. Therefore, the Transportation Analysis concluded that adequate emergency access would be provided to the project site.

In addition, the Transportation Analysis determined that future development of the project site, including any new roadway, bicycle, pedestrian, and transit infrastructure improvements, would be subject to and designed in accordance with the City's design standards and specifications that address potential design hazards including sight distance, driveway placement, and signage and striping. Additionally, any new transportation facilities, or improvements to such facilities associated with future development of the project site would be constructed in compliance with industry design standards and best practices consistent with the City's Municipal Code and building design and inspection requirements. According to the Transportation Analysis, future site-specific evaluations regarding access and circulation associated with future development of the project site would incorporate analysis of vehicular level of service, as well as service for pedestrians, bicyclists, and transit users. Therefore, the Transportation Analysis concluded that future development of the project site would result in a less-than-significant impact related to transportation hazards.

Based on the above, the proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) or result in inadequate emergency access. Therefore, a ***less-than-significant*** impact would occur.

XVIII. TRIBAL CULTURAL RESOURCES.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

a,b. As discussed in Section V, Cultural Resources, of this IS/MND, a records search of the CHRIS performed by the CCIC concluded that the project site does not contain any formally recorded prehistoric or historic archaeological resources or historic buildings or structures on any lists of historic resources.³⁵ Because the proposed project does not include ground disturbing activities, the CCIC determined that further study for on-site archaeological resources is not recommended at this time. A search of the NAHC SLF indicated that the project site does not contain any known Tribal Cultural Resources.³⁶

In compliance with AB 52 ([PRC Section 21080.3.1), and SB 18 notification letters were distributed to the Amah Mutsun Tribal Band, Confederated Villages of Lisjan Nation, Muwekma Ohlone Tribe of the San Francisco Bay Area, Northern Valley Yokut / Ohlone Tribe, Tule River Indian Tribe, Wilton Rancheria, and Wuksachi Indian Tribe/Eshom Valley Band on December 29, 2025. Responses were received from the Confederated Villages of Lisjan Nation and Northern Valley Yokut / Ohlone Tribe requesting consultation. The Confederated Villages of Lisjan Nation requested copies of the CHRIS search results and the draft IS/MND prepared for the proposed project. Upon receipt of the CHRIS search results and the draft IS/MND, the Confederated Villages of Lisjan Nation concluded consultation. Further requests for consultation by the Northern Valley Yokut / Ohlone Tribe were not received following their initial request, and consultation has since been closed.

Based on lack of identified cultural resources at the site and the previous disturbance that has occurred within the project site and vicinity, known Tribal Cultural Resources do not exist within the site. However, as discussed above, the possibility exists that construction activities associated with future development of the project site as facilitated by the proposed project could result in a substantial adverse change in the significance of a Tribal Cultural Resource if previously unknown Tribal Cultural Resources are uncovered during

³⁵ Central California Information Center. *Records Search File#: 13586L, Project: Yosemite Mixed-Use Conversion.* December 12, 2025.

³⁶ Native American Heritage Commission. *Re: Yosemite Mixed-Use Conversion Project, San Joaquin County.* December 30, 2025.

grading or other ground-disturbing activities. Thus, a ***potentially significant*** impact to Tribal Cultural Resources could occur.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

XVIII-1. *Implement Mitigation Measures V-2 and V-3.*

XIX. UTILITIES AND SERVICE SYSTEMS.

Would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a,c. The proposed project would include a GPA and rezone, and does not include any site-specific development plans, designs, or proposals at this time. Therefore, implementation of the proposed project would not directly result in the relocation or construction of new or expanded utilities. Nonetheless, the sections below describe the water supply, wastewater, stormwater drainage, electric power, and telecommunications infrastructure necessary to serve future on-site development as provided by the proposed project.

Water Supply and Wastewater Conveyance Infrastructure

Water supply and sewer service would be provided to future development within the project site by the City of Manteca Water Division and Sewer Division, respectively. As shown in Figure 3-1 of the City's Water Master Plan, a City water main currently exists within West Yosemite Avenue along the northern frontage of the project site.³⁷ In addition, according to Figure ES-1 of the City of Manteca Wastewater Master Plan, the City's existing sanitary sewer network currently extends within West Yosemite Avenue along the northern frontage of the project site.³⁸ While the proposed project does not include any site-specific development plans, designs, or proposals at this time, future on-site development would likely connect to existing water and wastewater infrastructure within the vicinity of the project site. Any future water and wastewater infrastructure would be sized and designed in accordance with all applicable local standards and regulations. While the proposed project would facilitate the future development of commercial and residential uses on the project site, operation of such uses would be typical of other commercial and residential uses that currently exist within the City of Manteca, and would

³⁷ City of Manteca. *Final Water Master Plan* [pg. 3-2]. February 2024.

³⁸ City of Manteca. *City of Manteca Wastewater Master Plan* [pg. ES.3]. February 2024.

not be anticipated to involve activities that would require or result in the relocation or construction of new or expanded water or wastewater conveyance infrastructure.

In addition, future on-site development would be required to comply with Municipal Code Chapter 13.38, Public Facilities Implementation Program Fees, which requires developers of property to pay water and sewer facility development fees. Required payment of such fees would ensure that the City receives adequate funding for necessary future utility improvements and expansions. Furthermore, future site-specific development proposals would be reviewed by the City of Manteca Water Division and Sewer Division as part of the development application review process in order to ensure that sufficient water and wastewater conveyance infrastructure would be available to maintain desired service levels.

The project site is currently developed with a mix of industrial and commercial uses, as well as single-family residences, and is located within an urbanized area. While it is uncertain whether the existing on-site development is currently provided water and sewer service by the City of Manteca Water Division and Sewer Division, respectively, or is provided water through groundwater wells and on-site septic, as discussed above, existing City water and sewer lines currently exist within West Yosemite Avenue along the northern boundary of the project site. Because existing water and wastewater infrastructure is located in the immediate project vicinity, future development of the site is not anticipated to require new or substantial extensions of existing water or wastewater infrastructure in order to serve the project site. In addition, future on-site development would be required to comply with the policies and actions included in the General Plan, as well as the Municipal Code and all other applicable regulations. Therefore, the proposed project would result in a less-than-significant impact related to construction of new or expanded water or wastewater conveyance supply facilities.

Wastewater Treatment

The City of Manteca Wastewater Quality Control Facility (WQCF) is a combined biofilter-activated sludge WWTP that serves commercial and residential properties in the City of Manteca, the City of Lathrop, and one frozen food packager (Eckert Cold Storage). The WQCF is located southwest of downtown Manteca at 2450 West Yosemite Avenue. The WQCF treated an average dry weather flow (ADWF) of about 7.2 million gallons per day (mgd) in 2020 and has an average dry weather design capacity of 9.87 mgd. According to the General Plan EIR, wastewater flow is projected to reach approximately 16.1 mgd by buildout of the General Plan. However, the City is planning to expand the capacity of the WQCF to 27 mgd by buildout. Considering the WQCF has been master planned to have a capacity of 27 mgd, and buildout of the City is expected to generate a wastewater treatment demand of 16.1 mgd, the WQCF would have adequate capacity to serve the City of Manteca at General Plan buildout.

As discussed previously, the proposed project would include a GPA to change the site's land use designations from I, CMU, PQP, and MDR to CMU, and a rezone of the site from PD, R2, M1, and CMU to CMU. Under the existing land use designations, the project site could be developed with up to 283,880.5 sf of industrial uses, 21,453.3 sf commercial uses, 160,736 sf PQP uses, and 129 residential units, which would result in an estimated population of 411 residents. Pursuant to the proposed CMU land use designation, the project site could be developed with up to 251,341.2 sf of commercial uses and 519 residential units, which would result in an estimated population of 1,655 residents. As such, the proposed project could result in future development of the project site with up to

228,887.9 additional sf of commercial uses and 390 new residential units than was previously anticipated for the site. However, given that the WQCF would have an excess capacity of 10.9 mgd at buildout, the WQCF would have sufficient capacity to accommodate increased demand for wastewater treatment associated with future development of the project site.

Furthermore, future on-site development would be required to comply with Municipal Code Chapter 13.38, Public Facilities Implementation Program Fees, specifically Section 13.38.050, which requires developers of property to pay a sewer facility development fee. Required payment of the sewer facility development fee would ensure that the WQCF receives adequate funding for necessary future improvements.

Based on the above, the proposed project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Stormwater Infrastructure

Currently, the project site is developed with a mix of industrial and commercial uses, as well as single-family residences; however, the majority of the site is currently unpaved and consists of pervious surfaces. While the proposed project does not include any site-specific development plans, designs, or proposals at this time, future development of the site would include the addition of new impervious surfaces on-site. However, as discussed in Section X, Hydrology and Water Quality, of this IS/MND, future development of the project site would require that the final design of future on-site drainage systems be reviewed and approved by the City of Manteca, which would ensure that future drainage system comply with all applicable regional and local standards, including those set forth in the City's Municipal Code, as well as requirements to incorporate sufficient permanent stormwater treatment control BMPs. In addition, future development of the project site would be designed in accordance with the requirements established by the City's NPDES Phase II MS4 stormwater permit. Compliance with the City's Municipal Code and NPDES Phase II MS4 stormwater permit, as well as all applicable regional and local regulation would ensure that future on-site stormwater treatment facilities would be designed with adequate capacity to capture and treat runoff from additional on-site impervious surfaces associated with future development. Therefore, the proposed project would result in a less-than-significant impact with respect to requiring or resulting in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Electricity, Natural Gas, and Telecommunications Facilities

The project site is located within a developed area of the City of Manteca and is situated within close proximity to existing electric power, natural gas, and telecommunications facilities. Thus, substantial expansion of such off-site utilities would not be required to serve future on-site development, and associated environmental effects would not occur.

Conclusion

Based on the above, a *less-than-significant* impact would occur related to requiring or resulting 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, or resulting in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

- b. The City of Manteca is the water service provider for the City. The City's water supply is provided by two main sources: surface water from the Stanislaus River supplied through an agreement with South San Joaquin Irrigation District, and groundwater pumped from the Eastern San Joaquin Subbasin. Implementation of the South County Water Supply Project, which began in 2005, provides for the delivery of treated surface water and has enabled the City to significantly reduce reliance on local groundwater sources and enhance water supply reliability. The City's goal is to achieve a 53 percent to 47 percent annual balance of surface water to groundwater, respectively. The proposed project would include a GPA and rezone, and does not include any site-specific development plans, designs, or proposals at this time. Thus, the proposed project would not directly result in the use of water. In addition, the City has generally found that water supply is not a limiting factor for new development.

In July 2023, the City adopted the City of Manteca 2020 UWMP, as required by the Urban Water Management Planning Act of 1983. The UWMP serves as a long-term planning document for sustainable water supply, and includes a description of water sources, historical and projected water use, and a comparison of water supply and demand during normal and dry years. The UWMP has identified regional water demand in normal, single dry, and multiple dry years in five-year increments based on buildout of the City's General Plan. According to the UWMP, increases in demand for water within the City's service area are not expected to exceed the City's supplies in any year between 2025 and 2045.

Under the existing land use designations, the project site could be developed with up to 283,880.5 sf of industrial uses, 21,453.3 sf commercial uses, 160,736 sf PQP uses, and 129 residential units, which would result in an estimated population of 411 residents. Pursuant to the proposed CMU land use designation, the project site could be developed with up to 251,341.2 sf of commercial uses and 519 residential units, which would result in an estimated population of 1,655 residents. As such, the proposed project could result in future development of the project site with up to 228,887.9 additional sf of commercial uses and 390 new residential units than was previously anticipated for the site. Based on the land use specific water demand factors included in Table 3.15-6 of the General Plan EIR, future development of the project site could result in an increase in water demand of approximately 10.22 AFY beyond what was analyzed for the project site in the General Plan EIR. However, according to the General Plan EIR, under normal, single dry, and multiple dry years, the City of Manteca would maintain a water supply surplus of 3,957 to 6,786 AFY. Therefore, the City would have adequate water supplies to accommodate future development of the project site as provided by the proposed project.

Although site-specific development plans, designs, or proposals have not been prepared for the project site, the City of Manteca currently has sufficient water supplies to provide for increases in water demand associated with future development of the project site. Based on the above, a ***less-than-significant*** impact could occur related to the City's ability to have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

- d,e. The City of Manteca Solid Waste Division collects solid waste throughout the City and deposits it at the Lovelace Solid Waste Transfer Station. Recyclable materials are sorted

at the Lovelace facility. Solid waste that is not recyclable is then transferred to other landfills in the area, including, but not limited to, the following:

1. Forward Landfill (I.D. SWIS #39-AA-0015): This solid waste landfill has a closure date of 2036 and has a remaining capacity of 24,720,669 cubic yards (CY).³⁹
2. Foothill Sanitary Landfill (I.D. SWIS #39-AA-0004): This solid waste landfill has a closure date of 2082 and has a remaining capacity of 125,000,000 CY.⁴⁰
3. North County Landfill and Recycling Center (I.D. SWIS #39-AA-0022): This solid waster landfill has a closure date of 2048 and has a remaining capacity of 35,400,000 CY.⁴¹

The proposed project would include a GPA and rezone, and does not include any site-specific development plans, designs, or proposals at this time. Therefore, implementation of the proposed project would not directly result in in the generation of solid waste. Nonetheless, due to the substantial amount of available capacity remaining at the landfills serving the City, sufficient capacity is anticipated to be available to accommodate the solid waste disposal needs of any future on-site development. Furthermore, the future development of the project site as provided by the proposed project would be required to comply with all applicable regulations included in Chapter 13.02, Solid Waste Collection and Disposal, of the City's Municipal Code.

Therefore, the proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals and would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Thus, a **less-than-significant** impact related to solid waste would occur as a result of the proposed project.

³⁹ CalRecycle. *SWIS Facility/Site Activity Details: Forward Landfill. (39-AA-0015)*. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1434?siteID=3106>. Accessed December 2025.

⁴⁰ CalRecycle. *SWIS Facility/Site Activity Details: Foothill Sanitary Landfill. (39-AA-0004)*. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1424?siteID=3097>. Accessed December 2025.

⁴¹ CalRecycle. *SWIS Facility/Site Activity Details: North County Landfill & Recycling Center. (39-AA-0022)*. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1448?siteID=3113>. Accessed December 2025.

XX. WILDFIRE.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a-d. According to the CAL FIRE Fire and Resource Assessment Program, the project site is not located within or near a VHFHSZ or State Responsibility Area.⁴² Additionally, the developed nature of the project area would help to prevent the spread of wildfire to the site, as development acts as a fuel break due to lack of brush and other vegetation that could act as fire fuel. Furthermore, future commercial and residential development provided by the proposed project would be required to include fire sprinklers, and other fire suppression features, consistent with the CBSC and California Fire Code. Therefore, the proposed project would not be expected to be subject to or result in substantial adverse effects related to wildfires, and a **less-than-significant** impact would occur.

⁴² California Department of Forestry and Fire Protection. *Fire Hazard Severity Zone Viewer*. Available at: <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>. Accessed December 2025.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a. As discussed in Section IV, Biological Resources, of this IS/MND, while the potential exists for special-status plant species, California tiger salamander, western spadefoot, giant garter snake, vernal pool invertebrates, pallid bat, Townsend’s big-eared bat, and western mastiff bat, Swainson’s hawk, western burrowing owl, and other nesting migratory birds and raptors to occur on-site, Mitigation Measures IV-1 through IV-5 would ensure that impacts to such species would be reduced to a less-than-significant level. Due to the unknown ages of the existing on-site buildings and structures, future on-site development, including potential improvements to and demolition of the on-site buildings and structures could potentially result in impacts related to historic or prehistoric resources. However, Mitigation Measures V-1 through V-3 would ensure that, in the event that historic or prehistoric resources are discovered within the project site, such resources would be protected in compliance with the requirements of CEQA.

Considering the above, the proposed project would not: 1) degrade the quality of the environment; 2) substantially reduce or impact the habitat of fish or wildlife species; 3) cause fish or wildlife populations to drop below self-sustaining levels; 4) threaten to eliminate a plant or animal community; 5) reduce the number or restrict the range of a rare or endangered plant or animal; or 6) eliminate important examples of the major periods of California history or prehistory. Therefore, a **less-than-significant** impact would occur.

b. The proposed project and future development of the project site facilitated by the proposed project in conjunction with other development within the City of Manteca could incrementally contribute to cumulative impacts in the area. However, as demonstrated in this IS/MND, all potential environmental impacts that could occur as a result of project implementation would be reduced to a less-than-significant level through compliance with the mitigation measures included in this IS/MND, as well as applicable General Plan policies, Municipal Code standards, and other applicable local and State regulations.

Therefore, when viewed in conjunction with other closely related past, present, or reasonably foreseeable future projects, future development facilitated by the proposed project would not result in a cumulatively considerable contribution to cumulative impacts in the City of Manteca, and the project's incremental contribution to cumulative impacts would be ***less-than-significant***.

- c. As described in this IS/MND, future on-site development facilitated by the proposed project would comply with all applicable General Plan policies, Municipal Code standards, other applicable local and State regulations, and mitigation measures included herein. In addition, as discussed in the Air Quality, Geology and Soils, Hazards and Hazardous Materials, and Noise sections of this IS/MND, future on-site development facilitated by the proposed project would not cause substantial effects to human beings, which cannot be mitigated to less-than-significant levels, including effects related to exposure to air pollutants, geologic hazards, hazardous materials, and excessive noise. As such, the proposed project would not result in direct or indirect impacts to human beings and, thus, the project's impact would be ***less-than-significant***.

APPENDIX A

AIR QUALITY AND GHG MODELING RESULTS

Yosemite Mixed Use Conversion GPA Custom Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Yosemite Mixed Use Conversion GPA
Construction Start Date	6/1/2026
Operational Year	2028
Lead Agency	City of Manteca
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.40000
Precipitation (days)	9.00000
Location	37.795933121457814, -121.2554024176976
County	San Joaquin
City	Manteca
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2166
EDFZ	4
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.37

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
Strip Mall	251.341	1000sqft	5.77000	251,341	50,268.2	—	—	—

Apartments Mid Rise	519.000	Dwelling Unit	17.3100	498,240	326,794	—	1,676.00	—
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1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	15.2938	14.8323	29.2076	39.5016	0.06093	1.24251	19.8040	21.0465	1.14311	10.1369	11.2800	—	10,019.3	10,019.3	0.27119	0.60437	21.0348	10,226.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	15.3232	14.8302	15.9050	36.0124	0.04452	0.44060	5.31576	5.75636	0.40845	1.27692	1.68537	—	9,681.55	9,681.55	0.27437	0.61638	0.61085	9,872.70
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.7176	10.4814	10.6113	24.9264	0.03180	0.28413	3.77551	4.05723	0.26197	0.90672	1.16812	—	6,903.07	6,903.07	0.17881	0.44027	6.48106	7,045.22
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.95597	1.91286	1.93657	4.54906	0.00580	0.05185	0.68903	0.74045	0.04781	0.16548	0.21318	—	1,142.88	1,142.88	0.02960	0.07289	1.07301	1,166.42

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
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Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.81580	3.21246	29.2076	29.6512	0.06093	1.24251	19.8040	21.0465	1.14311	10.1369	11.2800	—	6,779.71	6,779.71	0.27119	0.06010	0.79443	6,805.02
2027	15.2938	14.8323	14.5350	39.5016	0.04452	0.39441	5.31576	5.71018	0.36596	1.27692	1.64288	—	10,019.3	10,019.3	0.23833	0.60437	21.0348	10,226.4
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	15.3232	14.8302	15.9050	36.0124	0.04452	0.44060	5.31576	5.75636	0.40845	1.27692	1.68537	—	9,681.55	9,681.55	0.27437	0.61638	0.61085	9,872.70
2027	15.0026	14.6740	15.1034	34.3561	0.04452	0.39441	5.31576	5.71018	0.36596	1.27692	1.64288	—	9,556.13	9,556.13	0.27437	0.61638	0.54428	9,747.21
2028	14.8338	14.3884	14.3162	33.0455	0.04452	0.35439	5.31576	5.67015	0.32914	1.27692	1.60605	—	9,408.62	9,408.62	0.26237	0.59699	0.48401	9,593.57
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.09110	2.90108	7.74036	11.6188	0.01775	0.28413	2.39763	2.68177	0.26197	0.86078	1.12276	—	2,828.40	2,828.40	0.09005	0.12121	1.85945	2,868.63
2027	10.7176	10.4814	10.6113	24.9264	0.03180	0.28172	3.77551	4.05723	0.26140	0.90672	1.16812	—	6,903.07	6,903.07	0.17881	0.44027	6.48106	7,045.22
2028	2.10109	2.04669	1.72458	4.09829	0.00536	0.04273	0.65176	0.69448	0.03968	0.15640	0.19608	—	1,159.58	1,159.58	0.03047	0.07042	0.98869	1,182.32
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.56413	0.52945	1.41262	2.12043	0.00324	0.05185	0.43757	0.48942	0.04781	0.15709	0.20490	—	468.274	468.274	0.01491	0.02007	0.30785	474.935
2027	1.95597	1.91286	1.93657	4.54906	0.00580	0.05141	0.68903	0.74045	0.04771	0.16548	0.21318	—	1,142.88	1,142.88	0.02960	0.07289	1.07301	1,166.42
2028	0.38345	0.37352	0.31474	0.74794	0.00098	0.00780	0.11895	0.12674	0.00724	0.02854	0.03578	—	191.981	191.981	0.00505	0.01166	0.16369	195.746

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	89.9621	73.4560	38.6585	437.726	1.08220	17.8048	56.7266	74.5314	17.1442	14.4261	31.5704	3,245.69	78,075.5	81,321.2	59.4125	3.34089	195.866	83,998.0
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	82.3602	65.9805	42.8169	369.258	1.03302	17.7720	56.7266	74.4986	17.1196	14.4261	31.5457	3,245.69	73,172.2	76,417.9	59.8278	3.59481	10.0793	78,994.9
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	64.0608	58.0473	36.2012	293.639	0.72737	4.55402	56.4013	60.9553	4.37915	14.3448	18.7239	1,058.80	70,112.5	71,171.3	49.3203	3.46803	87.4903	73,525.3
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	11.6911	10.5936	6.60672	53.5891	0.13275	0.83111	10.2932	11.1243	0.79919	2.61792	3.41712	175.297	11,607.9	11,783.2	8.16555	0.57417	14.4850	12,173.0

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	41.2282	38.5910	29.6824	277.068	0.65558	0.51247	56.7266	57.2391	0.48114	14.4261	14.9073	—	66,886.3	66,886.3	2.74242	3.08724	190.732	68,065.6
Area	48.4584	34.7272	6.58639	159.400	0.41159	17.1019	—	17.1019	16.4727	—	16.4727	2,820.54	5,587.68	8,408.22	13.2935	0.01133	—	8,743.93
Energy	0.27555	0.13778	2.38968	1.25824	0.01503	0.19038	—	0.19038	0.19038	—	0.19038	—	5,523.04	5,523.04	0.67448	0.05532	—	5,556.39
Water	—	—	—	—	—	—	—	—	—	—	—	76.1266	78.5199	154.646	7.81861	0.18701	—	405.839
Waste	—	—	—	—	—	—	—	—	—	—	—	349.022	0.00000	349.022	34.8835	0.00000	—	1,221.11
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.13381	5.13381
Total	89.9621	73.4560	38.6585	437.726	1.08220	17.8048	56.7266	74.5314	17.1442	14.4261	31.5704	3,245.69	78,075.5	81,321.2	59.4125	3.34089	195.866	83,998.0
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	38.2820	35.4774	34.2116	249.028	0.60832	0.51290	56.7266	57.2395	0.48155	14.4261	14.9077	—	62,106.6	62,106.6	3.16288	3.34219	4.94551	63,186.6
Area	43.8026	30.3653	6.21558	118.972	0.40966	17.0687	—	17.0687	16.4476	—	16.4476	2,820.54	5,464.00	8,284.54	13.2883	0.01029	—	8,619.81
Energy	0.27555	0.13778	2.38968	1.25824	0.01503	0.19038	—	0.19038	0.19038	—	0.19038	—	5,523.04	5,523.04	0.67448	0.05532	—	5,556.39
Water	—	—	—	—	—	—	—	—	—	—	—	76.1266	78.5199	154.646	7.81861	0.18701	—	405.839
Waste	—	—	—	—	—	—	—	—	—	—	—	349.022	0.00000	349.022	34.8835	0.00000	—	1,221.11
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.13381	5.13381

Total	82.3602	65.9805	42.8169	369.258	1.03302	17.7720	56.7266	74.4986	17.1196	14.4261	31.5457	3,245.69	73,172.2	76,417.9	59.8278	3.59481	10.0793	78,994.9
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	38.3014	35.5894	32.2323	245.716	0.61936	0.51265	56.4013	56.9140	0.48132	14.3448	14.8261	—	63,222.5	63,222.5	2.95584	3.22288	82.3565	64,339.1
Area	25.4838	22.3201	1.57924	46.6649	0.09299	3.85099	—	3.85099	3.70745	—	3.70745	633.655	1,288.52	1,922.18	2.98787	0.00282	—	1,997.71
Energy	0.27555	0.13778	2.38968	1.25824	0.01503	0.19038	—	0.19038	0.19038	—	0.19038	—	5,523.04	5,523.04	0.67448	0.05532	—	5,556.39
Water	—	—	—	—	—	—	—	—	—	—	—	76.1266	78.5199	154.646	7.81861	0.18701	—	405.839
Waste	—	—	—	—	—	—	—	—	—	—	—	349.022	0.00000	349.022	34.8835	0.00000	—	1,221.11
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.13381	5.13381
Total	64.0608	58.0473	36.2012	293.639	0.72737	4.55402	56.4013	60.9553	4.37915	14.3448	18.7239	1,058.80	70,112.5	71,171.3	49.3203	3.46803	87.4903	73,525.3
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.99000	6.49507	5.88239	44.8431	0.11303	0.09356	10.2932	10.3868	0.08784	2.61792	2.70576	—	10,467.2	10,467.2	0.48937	0.53358	13.6351	10,652.1
Area	4.65080	4.07342	0.28821	8.51634	0.01697	0.70280	—	0.70280	0.67661	—	0.67661	104.909	213.329	318.238	0.49468	0.00047	—	330.744
Energy	0.05029	0.02514	0.43612	0.22963	0.00274	0.03474	—	0.03474	0.03474	—	0.03474	—	914.403	914.403	0.11167	0.00916	—	919.924
Water	—	—	—	—	—	—	—	—	—	—	—	12.6036	12.9999	25.6035	1.29446	0.03096	—	67.1914
Waste	—	—	—	—	—	—	—	—	—	—	—	57.7846	0.00000	57.7846	5.77537	0.00000	—	202.169
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.84996	0.84996
Total	11.6911	10.5936	6.60672	53.5891	0.13275	0.83111	10.2932	11.1243	0.79919	2.61792	3.41712	175.297	11,607.9	11,783.2	8.16555	0.57417	14.4850	12,173.0

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

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

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

ATTACHMENT 8

Off-Road	2.72490	2.28674	20.6515	19.0056	0.03253	0.84309	—	0.84309	0.77564	—	0.77564	—	3,426.59	3,426.59	0.13900	0.02780	—	3,438.35
Demolition	—	—	—	—	—	—	0.18012	0.18012	—	0.02728	0.02728	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14931	0.12530	1.13159	1.04140	0.00178	0.04620	—	0.04620	0.04250	—	0.04250	—	187.759	187.759	0.00762	0.00152	—	188.403
Demolition	—	—	—	—	—	—	0.00987	0.00987	—	0.00149	0.00149	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02725	0.02287	0.20652	0.19006	0.00033	0.00843	—	0.00843	0.00776	—	0.00776	—	31.0856	31.0856	0.00126	0.00025	—	31.1922
Demolition	—	—	—	—	—	—	0.00180	0.00180	—	0.00027	0.00027	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06371	0.05879	0.03778	0.72255	0.00000	0.00000	0.12601	0.12601	0.00000	0.02954	0.02954	—	135.849	135.849	0.00265	0.00492	0.46612	137.849
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00578	0.00249	0.16704	0.04022	0.00095	0.00271	0.03801	0.04072	0.00271	0.01041	0.01312	—	140.652	140.652	0.00226	0.02224	0.32831	147.663

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00327	0.00299	0.00234	0.03208	0.00000	0.00000	0.00686	0.00686	0.00000	0.00161	0.00161	—	6.89648	6.89648	0.00016	0.00029	0.01103	6.99738
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00031	0.00013	0.00954	0.00222	0.00005	0.00015	0.00207	0.00222	0.00015	0.00057	0.00072	—	7.70896	7.70896	0.00012	0.00122	0.00772	8.08286
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00060	0.00054	0.00043	0.00586	0.00000	0.00000	0.00125	0.00125	0.00000	0.00029	0.00029	—	1.14179	1.14179	0.00003	0.00005	0.00183	1.15850
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00006	0.00002	0.00174	0.00041	0.00001	0.00003	0.00038	0.00041	0.00003	0.00010	0.00013	—	1.27631	1.27631	0.00002	0.00020	0.00128	1.33821

3.3. Site Preparation (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.74146	3.14387	29.1635	28.8082	0.04890	1.24251	—	1.24251	1.14311	—	1.14311	—	5,297.94	5,297.94	0.21491	0.04298	—	5,316.12
Dust From Material Movement	—	—	—	—	—	—	19.6570	19.6570	—	10.1024	10.1024	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

ATTACHMENT 8

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10251	0.08613	0.79900	0.78927	0.00134	0.03404	—	0.03404	0.03132	—	0.03132	—	145.149	145.149	0.00589	0.00118	—	145.647
Dust From Material Movement	—	—	—	—	—	—	0.53855	0.53855	—	0.27678	0.27678	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01871	0.01572	0.14582	0.14404	0.00024	0.00621	—	0.00621	0.00572	—	0.00572	—	24.0311	24.0311	0.00097	0.00019	—	24.1135
Dust From Material Movement	—	—	—	—	—	—	0.09829	0.09829	—	0.05051	0.05051	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07433	0.06859	0.04407	0.84297	0.00000	0.00000	0.14701	0.14701	0.00000	0.03446	0.03446	—	158.491	158.491	0.00309	0.00574	0.54381	160.824
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00191	0.00174	0.00136	0.01872	0.00000	0.00000	0.00400	0.00400	0.00000	0.00094	0.00094	—	4.02294	4.02294	0.00010	0.00017	0.00643	4.08181

Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00035	0.00032	0.00025	0.00342	0.00000	0.00000	0.00073	0.00073	0.00000	0.00017	0.00017	—	0.66604	0.66604	0.00002	0.00003	0.00107	0.67579	
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	

3.5. Grading (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.62261	3.04400	27.2253	27.5707	0.06093	1.12137	—	1.12137	1.03166	—	1.03166	—	6,598.58	6,598.58	0.26767	0.05353	—	6,621.22
Dust From Material Movement	—	—	—	—	—	—	9.20359	9.20359	—	3.65375	3.65375	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34737	0.29189	2.61064	2.64376	0.00584	0.10753	—	0.10753	0.09893	—	0.09893	—	632.740	632.740	0.02567	0.00513	—	634.912

ATTACHMENT 8

Dust From Material Movement	—	—	—	—	—	—	0.88254	0.88254	—	0.35036	0.35036	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06340	0.05327	0.47644	0.48249	0.00107	0.01962	—	0.01962	0.01805	—	0.01805	—	104.757	104.757	0.00425	0.00085	—	105.117
Dust From Material Movement	—	—	—	—	—	—	0.16106	0.16106	—	0.06394	0.06394	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08495	0.07839	0.05037	0.96340	0.00000	0.00000	0.16801	0.16801	0.00000	0.03938	0.03938	—	181.132	181.132	0.00353	0.00657	0.62149	183.799
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00764	0.00697	0.00546	0.07486	0.00000	0.00000	0.01602	0.01602	0.00000	0.00375	0.00375	—	16.0918	16.0918	0.00038	0.00067	0.02574	16.3272
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00139	0.00127	0.00100	0.01366	0.00000	0.00000	0.00292	0.00292	0.00000	0.00068	0.00068	—	2.66418	2.66418	0.00006	0.00011	0.00426	2.70316

Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.7. Building Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.27993	1.07101	9.85401	12.9664	0.02340	0.37865	—	0.37865	0.34836	—	0.34836	—	2,397.24	2,397.24	0.09724	0.01945	—	2,405.47	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.23044	0.19282	1.77411	2.33446	0.00421	0.06817	—	0.06817	0.06272	—	0.06272	—	431.597	431.597	0.01751	0.00350	—	433.078	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04205	0.03519	0.32377	0.42604	0.00077	0.01244	—	0.01244	0.01145	—	0.01145	—	71.4558	71.4558	0.00290	0.00058	—	71.7010	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.81877	1.64968	1.44174	17.3175	0.00000	0.00000	3.81485	3.81485	0.00000	0.89419	0.89419	—	3,717.34	3,717.34	0.10011	0.15908	0.36597	3,767.61
Vendor	0.13726	0.08142	3.46449	1.13217	0.01940	0.03879	0.73795	0.77674	0.03879	0.20388	0.24267	—	2,690.00	2,690.00	0.05158	0.40495	0.17168	2,812.13
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.32565	0.29701	0.23273	3.19135	0.00000	0.00000	0.68285	0.68285	0.00000	0.16000	0.16000	—	686.003	686.003	0.01622	0.02864	1.09714	696.041
Vendor	0.02510	0.01543	0.61100	0.20000	0.00349	0.00698	0.13221	0.13920	0.00698	0.03655	0.04353	—	484.064	484.064	0.00929	0.07291	0.51432	506.536
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05943	0.05420	0.04247	0.58242	0.00000	0.00000	0.12462	0.12462	0.00000	0.02920	0.02920	—	113.576	113.576	0.00269	0.00474	0.18164	115.237
Vendor	0.00458	0.00282	0.11151	0.03650	0.00064	0.00127	0.02413	0.02540	0.00127	0.00667	0.00794	—	80.1422	80.1422	0.00154	0.01207	0.08515	83.8629
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.9. Building Construction (2027) - 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	1.23076	1.02988	9.39093	12.9379	0.02340	0.33657	—	0.33657	0.30965	—	0.30965	—	2,397.08	2,397.08	0.09724	0.01945	—	2,405.30

ATTACHMENT 8

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23076	1.02988	9.39093	12.9379	0.02340	0.33657	—	0.33657	0.30965	—	0.30965	—	2,397.08	2,397.08	0.09724	0.01945	—	2,405.30	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.87911	0.73563	6.70781	9.24139	0.01671	0.24041	—	0.24041	0.22118	—	0.22118	—	1,712.20	1,712.20	0.06945	0.01389	—	1,718.07	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16044	0.13425	1.22418	1.68655	0.00305	0.04387	—	0.04387	0.04036	—	0.04036	—	283.474	283.474	0.01150	0.00230	—	284.447	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.83879	1.68972	1.00454	20.3247	0.00000	0.00000	3.81485	3.81485	0.00000	0.89419	0.89419	—	4,047.69	4,047.69	0.07008	0.14907	12.6985	4,106.57	
Vendor	0.14152	0.08355	3.10749	1.04862	0.01940	0.03879	0.73795	0.77674	0.03879	0.20388	0.24267	—	2,631.49	2,631.49	0.05158	0.40495	5.79664	2,759.25	
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	1.59962	1.55957	1.30268	16.0048	0.00000	0.00000	3.81485	3.81485	0.00000	0.89419	0.89419	—	3,659.72	3,659.72	0.10011	0.15908	0.32853	3,709.95
Vendor	0.13726	0.08142	3.31807	1.08698	0.01940	0.03879	0.73795	0.77674	0.03879	0.20388	0.24267	—	2,633.88	2,633.88	0.05158	0.40495	0.15005	2,755.99
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.14259	1.11398	0.82401	11.7666	0.00000	0.00000	2.70914	2.70914	0.00000	0.63477	0.63477	—	2,679.29	2,679.29	0.05721	0.11363	3.91508	2,718.50
Vendor	0.09956	0.05816	2.32103	0.76119	0.01385	0.02771	0.52454	0.55225	0.02771	0.14499	0.17270	—	1,880.35	1,880.35	0.03684	0.28925	1.78297	1,969.25
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.20852	0.20330	0.15038	2.14741	0.00000	0.00000	0.49442	0.49442	0.00000	0.11585	0.11585	—	443.588	443.588	0.00947	0.01881	0.64819	450.079
Vendor	0.01817	0.01061	0.42359	0.13892	0.00253	0.00506	0.09573	0.10079	0.00506	0.02646	0.03152	—	311.314	311.314	0.00610	0.04789	0.29519	326.032
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.11. Building Construction (2028) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18481	0.99143	8.92495	12.9352	0.02340	0.30024	—	0.30024	0.27622	—	0.27622	—	2,397.46	2,397.46	0.09725	0.01945	—	2,405.68
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.14144	0.11835	1.06541	1.54413	0.00279	0.03584	—	0.03584	0.03297	—	0.03297	—	286.193	286.193	0.01161	0.00232	—	287.176
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02581	0.02160	0.19444	0.28180	0.00051	0.00654	—	0.00654	0.00602	—	0.00602	—	47.3826	47.3826	0.00192	0.00038	—	47.5452
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.51953	1.36045	1.16362	14.9602	0.00000	0.00000	3.81485	3.81485	0.00000	0.89419	0.89419	—	3,589.48	3,589.48	0.09010	0.15908	0.29448	3,639.43
Vendor	0.11786	0.07929	3.18678	1.03967	0.01940	0.03879	0.73795	0.77674	0.03879	0.20388	0.24267	—	2,570.27	2,570.27	0.05158	0.38556	0.13063	2,686.59
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.18259	0.16360	0.13532	1.82053	0.00000	0.00000	0.45276	0.45276	0.00000	0.10609	0.10609	—	439.146	439.146	0.00956	0.01780	0.58521	445.273
Vendor	0.01382	0.00946	0.37197	0.12182	0.00232	0.00463	0.08766	0.09229	0.00463	0.02423	0.02886	—	306.656	306.656	0.00616	0.04577	0.25957	320.709
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03332	0.02986	0.02470	0.33225	0.00000	0.00000	0.08263	0.08263	0.00000	0.01936	0.01936	—	72.7057	72.7057	0.00158	0.00295	0.09689	73.7201
Vendor	0.00252	0.00173	0.06788	0.02223	0.00042	0.00085	0.01600	0.01684	0.00085	0.00442	0.00527	—	50.7703	50.7703	0.00102	0.00758	0.04297	53.0970
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.13. Paving (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.90546	0.76084	7.11822	9.93804	0.01395	0.31987	—	0.31987	0.29428	—	0.29428	—	1,510.59	1,510.59	0.06128	0.01226	—	1,515.78
Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04961	0.04169	0.39004	0.54455	0.00076	0.01753	—	0.01753	0.01612	—	0.01612	—	82.7721	82.7721	0.00336	0.00067	—	83.0562
Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00905	0.00761	0.07118	0.09938	0.00014	0.00320	—	0.00320	0.00294	—	0.00294	—	13.7039	13.7039	0.00056	0.00011	—	13.7509
Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06371	0.05879	0.03778	0.72255	0.00000	0.00000	0.12601	0.12601	0.00000	0.02954	0.02954	—	135.849	135.849	0.00265	0.00492	0.46612	137.849
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00327	0.00299	0.00234	0.03208	0.00000	0.00000	0.00686	0.00686	0.00000	0.00161	0.00161	—	6.89648	6.89648	0.00016	0.00029	0.01103	6.99738
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00060	0.00054	0.00043	0.00586	0.00000	0.00000	0.00125	0.00125	0.00000	0.00029	0.00029	—	1.14179	1.14179	0.00003	0.00005	0.00183	1.15850
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.15. Architectural Coating (2026) - Unmitigated

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

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

ATTACHMENT 8

Off-Road Equipment	0.14557	0.12031	0.85645	1.13283	0.00173	0.02315	—	0.02315	0.02130	—	0.02130	—	133.504	133.504	0.00542	0.00108	—	133.963
Architectural Coatings	11.5779	11.5779	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02222	0.01836	0.13073	0.17292	0.00026	0.00353	—	0.00353	0.00325	—	0.00325	—	20.3784	20.3784	0.00083	0.00017	—	20.4483
Architectural Coatings	1.76727	1.76727	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00406	0.00335	0.02386	0.03156	0.00005	0.00064	—	0.00064	0.00059	—	0.00059	—	3.37387	3.37387	0.00014	0.00003	—	3.38545
Architectural Coatings	0.32253	0.32253	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.36375	0.32994	0.28835	3.46350	0.00000	0.00000	0.76297	0.76297	0.00000	0.17884	0.17884	—	743.467	743.467	0.02002	0.03182	0.07319	753.522
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05522	0.05036	0.03946	0.54114	0.00000	0.00000	0.11579	0.11579	0.00000	0.02713	0.02713	—	116.322	116.322	0.00275	0.00486	0.18604	118.024
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01008	0.00919	0.00720	0.09876	0.00000	0.00000	0.02113	0.02113	0.00000	0.00495	0.00495	—	19.2585	19.2585	0.00046	0.00080	0.03080	19.5403
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.17. Architectural Coating (2027) - 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	0.13715	0.11335	0.83116	1.12539	0.00173	0.01905	—	0.01905	0.01752	—	0.01752	—	133.513	133.513	0.00542	0.00108	—	133.971
Architectural Coatings	11.5779	11.5779	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

ATTACHMENT 8

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13715	0.11335	0.83116	1.12539	0.00173	0.01905	—	0.01905	0.01752	—	0.01752	—	133.513	133.513	0.00542	0.00108	—	133.971	
Architectural Coatings	11.5779	11.5779	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Off-Road Equipment	0.09797	0.08096	0.59369	0.80385	0.00123	0.01361	—	0.01361	0.01252	—	0.01252	—	95.3662	95.3662	0.00387	0.00077	—	95.6935	
Architectural Coatings	8.26990	8.26990	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Off-Road Equipment	0.01788	0.01478	0.10835	0.14670	0.00022	0.00248	—	0.00248	0.00228	—	0.00228	—	15.7890	15.7890	0.00064	0.00013	—	15.8432	
Architectural Coatings	1.50926	1.50926	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.36776	0.33794	0.20091	4.06495	0.00000	0.00000	0.76297	0.76297	0.00000	0.17884	0.17884	—	809.539	809.539	0.01402	0.02981	2.53969	821.313
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.31992	0.31191	0.26054	3.20096	0.00000	0.00000	0.76297	0.76297	0.00000	0.17884	0.17884	—	731.943	731.943	0.02002	0.03182	0.06571	741.991
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22852	0.22280	0.16480	2.35332	0.00000	0.00000	0.54183	0.54183	0.00000	0.12695	0.12695	—	535.859	535.859	0.01144	0.02273	0.78302	543.700
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04170	0.04066	0.03008	0.42948	0.00000	0.00000	0.09888	0.09888	0.00000	0.02317	0.02317	—	88.7175	88.7175	0.00189	0.00376	0.12964	90.0158
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.19. Architectural Coating (2028) - 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12985	0.10731	0.80814	1.11833	0.00173	0.01536	—	0.01536	0.01413	—	0.01413	—	133.517	133.517	0.00542	0.00108	—	133.975
Architectural Coatings	11.5779	11.5779	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01906	0.01575	0.11861	0.16414	0.00025	0.00225	—	0.00225	0.00207	—	0.00207	—	19.5964	19.5964	0.00079	0.00016	—	19.6637
Architectural Coatings	1.69930	1.69930	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00348	0.00287	0.02165	0.02996	0.00005	0.00041	—	0.00041	0.00038	—	0.00038	—	3.24441	3.24441	0.00013	0.00003	—	3.25555
Architectural Coatings	0.31012	0.31012	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.30391	0.27209	0.23272	2.99204	0.00000	0.00000	0.76297	0.76297	0.00000	0.17884	0.17884	—	717.895	717.895	0.01802	0.03182	0.05890	727.886
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04490	0.04023	0.03328	0.44767	0.00000	0.00000	0.11133	0.11133	0.00000	0.02609	0.02609	—	107.987	107.987	0.00235	0.00438	0.14390	109.493
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00819	0.00734	0.00607	0.08170	0.00000	0.00000	0.02032	0.02032	0.00000	0.00476	0.00476	—	17.8784	17.8784	0.00039	0.00072	0.02383	18.1279
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	29.9308	28.1079	20.6443	190.821	0.44381	0.34882	38.2904	38.6392	0.32744	9.73760	10.0650	—	45,281.3	45,281.3	1.93979	2.13278	128.744	46,094.1

Apartment Mid Rise	11.2974	10.4831	9.03813	86.2467	0.21177	0.16365	18.4363	18.5999	0.15370	4.68852	4.84222	—	21,605.0	21,605.0	0.80262	0.95446	61.9882	21,971.5
Total	41.2282	38.5910	29.6824	277.068	0.65558	0.51247	56.7266	57.2391	0.48114	14.4261	14.9073	—	66,886.3	66,886.3	2.74242	3.08724	190.732	68,065.6
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	27.7541	25.8036	23.7887	173.635	0.41195	0.34914	38.2904	38.6395	0.32775	9.73760	10.0654	—	42,058.9	42,058.9	2.25327	2.31055	3.33821	42,807.1
Apartment Mid Rise	10.5279	9.67380	10.4229	75.3929	0.19637	0.16377	18.4363	18.6000	0.15381	4.68852	4.84232	—	20,047.7	20,047.7	0.90961	1.03164	1.60730	20,379.5
Total	38.2820	35.4774	34.2116	249.028	0.60832	0.51290	56.7266	57.2395	0.48155	14.4261	14.9077	—	62,106.6	62,106.6	3.16288	3.34219	4.94551	63,186.6
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	5.06827	4.72500	4.08899	31.1157	0.07654	0.06368	6.94792	7.01160	0.05978	1.76709	1.82688	—	7,087.69	7,087.69	0.34759	0.36868	9.20363	7,215.45
Apartment Mid Rise	1.92173	1.77007	1.79340	13.7274	0.03650	0.02988	3.34532	3.37520	0.02806	0.85083	0.87889	—	3,379.51	3,379.51	0.14178	0.16491	4.43142	3,436.62
Total	6.99000	6.49507	5.88239	44.8431	0.11303	0.09356	10.2932	10.3868	0.08784	2.61792	2.70576	—	10,467.2	10,467.2	0.48937	0.53358	13.6351	10,652.1

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	1,223.73	1,223.73	0.19797	0.02400	—	1,235.83
Apartment Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	1,310.38	1,310.38	0.21199	0.02570	—	1,323.33

Total	—	—	—	—	—	—	—	—	—	—	—	—	2,534.11	2,534.11	0.40996	0.04969	—	2,559.17
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	1,223.73	1,223.73	0.19797	0.02400	—	1,235.83
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	1,310.38	1,310.38	0.21199	0.02570	—	1,323.33
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,534.11	2,534.11	0.40996	0.04969	—	2,559.17
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	202.603	202.603	0.03278	0.00397	—	204.606
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	216.948	216.948	0.03510	0.00425	—	219.093
Total	—	—	—	—	—	—	—	—	—	—	—	—	419.551	419.551	0.06787	0.00823	—	423.699

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	0.06405	0.03203	0.58232	0.48915	0.00349	0.04426	—	0.04426	0.04426	—	0.04426	—	694.802	694.802	0.06149	0.00131	—	696.729
Apartments Mid Rise	0.21150	0.10575	1.80736	0.76909	0.01154	0.14613	—	0.14613	0.14613	—	0.14613	—	2,294.13	2,294.13	0.20303	0.00432	—	2,300.49
Total	0.27555	0.13778	2.38968	1.25824	0.01503	0.19038	—	0.19038	0.19038	—	0.19038	—	2,988.93	2,988.93	0.26452	0.00563	—	2,997.22
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Strip Mall	0.06405	0.03203	0.58232	0.48915	0.00349	0.04426	—	0.04426	0.04426	—	0.04426	—	694.802	694.802	0.06149	0.00131	—	696.729
Apartments Mid Rise	0.21150	0.10575	1.80736	0.76909	0.01154	0.14613	—	0.14613	0.14613	—	0.14613	—	2,294.13	2,294.13	0.20303	0.00432	—	2,300.49
Total	0.27555	0.13778	2.38968	1.25824	0.01503	0.19038	—	0.19038	0.19038	—	0.19038	—	2,988.93	2,988.93	0.26452	0.00563	—	2,997.22
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	0.01169	0.00585	0.10627	0.08927	0.00064	0.00808	—	0.00808	0.00808	—	0.00808	—	115.032	115.032	0.01018	0.00022	—	115.351
Apartments Mid Rise	0.03860	0.01930	0.32984	0.14036	0.00211	0.02667	—	0.02667	0.02667	—	0.02667	—	379.820	379.820	0.03361	0.00072	—	380.873
Total	0.05029	0.02514	0.43612	0.22963	0.00274	0.03474	—	0.03474	0.03474	—	0.03474	—	494.852	494.852	0.04379	0.00093	—	496.224

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	26.5880	13.1507	6.21558	118.972	0.40966	17.0687	—	17.0687	16.4476	—	16.4476	2,820.54	5,464.00	8,284.54	13.2883	0.01029	—	8,619.81
Consumer Products	16.0410	16.0410	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	1.17365	1.17365	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	4.65573	4.36186	0.37081	40.4277	0.00193	0.03320	—	0.03320	0.02507	—	0.02507	—	123.677	123.677	0.00518	0.00104	—	124.116

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Total	48.4584	34.7272	6.58639	159.400	0.41159	17.1019	—	17.1019	16.4727	—	16.4727	2,820.54	5,587.68	8,408.22	13.2935	0.01133	—	8,743.93
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	26.5880	13.1507	6.21558	118.972	0.40966	17.0687	—	17.0687	16.4476	—	16.4476	2,820.54	5,464.00	8,284.54	13.2883	0.01029	—	8,619.81
Consumer Products	16.0410	16.0410	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	1.17365	1.17365	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	43.8026	30.3653	6.21558	118.972	0.40966	17.0687	—	17.0687	16.4476	—	16.4476	2,820.54	5,464.00	8,284.54	13.2883	0.01029	—	8,619.81
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1.09011	0.53918	0.25484	4.87785	0.01680	0.69982	—	0.69982	0.67435	—	0.67435	104.909	203.231	308.140	0.49425	0.00038	—	320.611
Consumer Products	2.92749	2.92749	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.21419	0.21419	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.41902	0.39257	0.03337	3.63849	0.00017	0.00299	—	0.00299	0.00226	—	0.00226	—	10.0978	10.0978	0.00042	0.00008	—	10.1337
Total	4.65080	4.07342	0.28821	8.51634	0.01697	0.70280	—	0.70280	0.67661	—	0.67661	104.909	213.329	318.238	0.49468	0.00047	—	330.744

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)

ATTACHMENT 8

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	35.6754	34.6059	70.2814	3.66371	0.08759	—	187.977
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	40.4511	43.9140	84.3651	4.15491	0.09941	—	217.862
Total	—	—	—	—	—	—	—	—	—	—	—	76.1266	78.5199	154.646	7.81861	0.18701	—	405.839
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	35.6754	34.6059	70.2814	3.66371	0.08759	—	187.977
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	40.4511	43.9140	84.3651	4.15491	0.09941	—	217.862
Total	—	—	—	—	—	—	—	—	—	—	—	76.1266	78.5199	154.646	7.81861	0.18701	—	405.839
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	5.90648	5.72941	11.6359	0.60657	0.01450	—	31.1218
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	6.69715	7.27046	13.9676	0.68789	0.01646	—	36.0696
Total	—	—	—	—	—	—	—	—	—	—	—	12.6036	12.9999	25.6035	1.29446	0.03096	—	67.1914

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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ATTACHMENT 8

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	142.230	0.00000	142.230	14.2154	0.00000	—	497.615
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	206.792	0.00000	206.792	20.6681	0.00000	—	723.495
Total	—	—	—	—	—	—	—	—	—	—	—	349.022	0.00000	349.022	34.8835	0.00000	—	1,221.11
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	142.230	0.00000	142.230	14.2154	0.00000	—	497.615
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	206.792	0.00000	206.792	20.6681	0.00000	—	723.495
Total	—	—	—	—	—	—	—	—	—	—	—	349.022	0.00000	349.022	34.8835	0.00000	—	1,221.11
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	23.5478	0.00000	23.5478	2.35352	0.00000	—	82.3859
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	34.2368	0.00000	34.2368	3.42184	0.00000	—	119.783
Total	—	—	—	—	—	—	—	—	—	—	—	57.7846	0.00000	57.7846	5.77537	0.00000	—	202.169

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.56541	1.56541
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.56840	3.56840
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.13381	5.13381
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.56541	1.56541
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.56840	3.56840
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.13381	5.13381
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.25917	0.25917
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.59079	0.59079
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.84996	0.84996

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Demolition	Demolition	6/1/2026	6/29/2026	5.00000	20.0000	—
Site Preparation	Site Preparation	6/30/2026	7/14/2026	5.00000	10.00000	—
Grading	Grading	7/15/2026	9/2/2026	5.00000	35.0000	—

Building Construction	Building Construction	10/1/2026	3/1/2028	5.00000	370.000	—
Paving	Paving	9/3/2026	9/30/2026	5.00000	20.0000	—
Architectural Coating	Architectural Coating	10/15/2026	3/15/2028	5.00000	370.000	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.000000	8.00000	33.0000	0.73000
Demolition	Excavators	Diesel	Average	3.00000	8.00000	36.0000	0.38000
Demolition	Rubber Tired Dozers	Diesel	Average	2.00000	8.00000	367.000	0.40000
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00000	8.00000	367.000	0.40000
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	4.00000	8.00000	84.0000	0.37000
Grading	Excavators	Diesel	Average	2.00000	8.00000	36.0000	0.38000
Grading	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Grading	Rubber Tired Dozers	Diesel	Average	1.000000	8.00000	367.000	0.40000
Grading	Scrapers	Diesel	Average	2.00000	8.00000	423.000	0.48000
Grading	Tractors/Loaders/Back hoes	Diesel	Average	2.00000	8.00000	84.0000	0.37000
Building Construction	Cranes	Diesel	Average	1.000000	7.00000	367.000	0.29000
Building Construction	Forklifts	Diesel	Average	3.00000	8.00000	82.0000	0.20000
Building Construction	Generator Sets	Diesel	Average	1.000000	8.00000	14.0000	0.74000
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	3.00000	7.00000	84.0000	0.37000
Building Construction	Welders	Diesel	Average	1.000000	8.00000	46.0000	0.45000
Paving	Pavers	Diesel	Average	2.00000	8.00000	81.0000	0.42000
Paving	Paving Equipment	Diesel	Average	2.00000	8.00000	89.0000	0.36000
Paving	Rollers	Diesel	Average	2.00000	8.00000	36.0000	0.38000

Architectural Coating	Air Compressors	Diesel	Average	1.000000	6.00000	37.0000	0.48000
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5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Worker	15.0000	11.8900	LDA,LDT1,LDT2
Demolition	Vendor	—	9.10000	HHDT,MHDT
Demolition	Hauling	2.05000	20.0000	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	Worker	17.5000	11.8900	LDA,LDT1,LDT2
Site Preparation	Vendor	—	9.10000	HHDT,MHDT
Site Preparation	Hauling	0.00000	20.0000	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	20.0000	11.8900	LDA,LDT1,LDT2
Grading	Vendor	—	9.10000	HHDT,MHDT
Grading	Hauling	0.00000	20.0000	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	454.109	11.8900	LDA,LDT1,LDT2
Building Construction	Vendor	96.6759	9.10000	HHDT,MHDT
Building Construction	Hauling	0.00000	20.0000	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	15.0000	11.8900	LDA,LDT1,LDT2
Paving	Vendor	—	9.10000	HHDT,MHDT
Paving	Hauling	0.00000	20.0000	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	90.8218	11.8900	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	9.10000	HHDT,MHDT

Architectural Coating	Hauling	0.00000	20.0000	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	1,008,936	336,312	377,012	125,671	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00000	0.00000	0.00000	3,522.60	0.00000
Site Preparation	—	—	15.0000	0.00000	0.00000
Grading	—	—	105.000	0.00000	0.00000
Paving	0.00000	0.00000	0.00000	0.00000	0.00000

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Strip Mall	0.00000	0%
Paving	Apartments Mid Rise	—	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00000	203.983	0.03300	0.00400
2027	0.00000	203.983	0.03300	0.00400
2028	0.00000	203.983	0.03300	0.00400

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
Strip Mall	8,231.17	8,231.17	8,231.17	3,004,376	53,776.0	53,776.0	53,776.0	19,628,242
Apartments Mid Rise	2,900.69	2,900.69	2,900.69	1,058,752	25,892.4	25,892.4	25,892.4	9,450,720

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Strip Mall	Wood Fireplaces	0	0
Strip Mall	Gas Fireplaces	0	0
Strip Mall	Propane Fireplaces	0	0
Strip Mall	Electric Fireplaces	0	0
Strip Mall	No Fireplaces	0	0
Strip Mall	Conventional Wood Stoves	0	0
Strip Mall	Catalytic Wood Stoves	0	0
Strip Mall	Non-Catalytic Wood Stoves	0	0
Strip Mall	Pellet Wood Stoves	0	0

Apartments Mid Rise	Wood Fireplaces	0	0
Apartments Mid Rise	Gas Fireplaces	260	260
Apartments Mid Rise	Propane Fireplaces	0	0
Apartments Mid Rise	Electric Fireplaces	0	0
Apartments Mid Rise	No Fireplaces	260	260
Apartments Mid Rise	Conventional Wood Stoves	0	0
Apartments Mid Rise	Catalytic Wood Stoves	26	26
Apartments Mid Rise	Non-Catalytic Wood Stoves	26	26
Apartments Mid Rise	Pellet Wood Stoves	0	0

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)
1,008,936	336,312	377,012	125,671	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00000
Summer Days	day/yr	180.000

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)
Strip Mall	2,189,702	203.983	0.0330	0.0040	2,167,967
Apartments Mid Rise	2,344,744	203.983	0.0330	0.0040	7,158,303

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Strip Mall	18,617,462	705,568
Apartments Mid Rise	21,109,689	5,606,206

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Strip Mall	263.908	0.00000
Apartments Mid Rise	383.702	0.00000

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088.00	0.00180	4.00000	4.00000	18.0000
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430.00	0.03750	1.000000	0.00000	1.000000
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922.00	0.00040	7.50000	7.50000	20.0000
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088.00	0.00225	2.50000	2.50000	10.00000
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430.00	0.11538	0.60000	0.00000	1.000000

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

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

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Land Use	Building square footage and acreage adjusted to represent the proposed buildout of the site.
Construction: Construction Phases	Based on typical construction practices, architectural coating assumed to start two weeks after the start of building construction and last for the same number of days.
Operations: Vehicle Data	Trip rates adjusted to be consistent with transportation assessment prepared for the proposed project.

8.3. Land Use

Model Parameter	Units	Default Value	New Value
Lot Area	acre	5.77000	5.77000
Landscape Area	sq. ft	—	50,268.2
Lot Area	acre	13.6579	17.3100
Landscape Area	sq. ft	—	326,794

8.4. Construction

8.4.1. Construction Phases

Phase Type	Phase Name	Model Parameter	Default Value	New Value
Building Construction	Building Construction	Start Date	9/3/2026	10/1/2026
Building Construction	Building Construction	End Date	2/3/2028	3/1/2028
Paving	Paving	Start Date	2/4/2028	9/3/2026
Paving	Paving	End Date	3/3/2028	9/30/2026
Architectural Coating	Architectural Coating	Start Date	3/4/2028	10/15/2026
Architectural Coating	Architectural Coating	End Date	4/1/2028	3/15/2028
Architectural Coating	Architectural Coating	Work Days per Phase	20.0000	370.000

8.5. Operations

8.5.1. Mobile Sources

8.5.1.1. Vehicle Data

Land Use	Model Parameter	Units	Default Value	New Value
Strip Mall	Weekday Trip Rate	size/day	44.3200	32.7490
Strip Mall	Saturday Trip Rate	size/day	42.0400	32.7490
Strip Mall	Sunday Trip Rate	size/day	20.4300	32.7490
Apartments Mid Rise	Weekday Trip Rate	size/day	5.44000	5.58900
Apartments Mid Rise	Saturday Trip Rate	size/day	4.91000	5.58900
Apartments Mid Rise	Sunday Trip Rate	size/day	4.09000	5.58900

Yosemite Mixed Use Conversion GPA - Mitigated Custom Report

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3. Construction Emissions Details
 - 3.1. Demolition (2026) - Unmitigated
 - 3.3. Site Preparation (2026) - Unmitigated
 - 3.5. Grading (2026) - Unmitigated
 - 3.7. Building Construction (2026) - Unmitigated
 - 3.9. Building Construction (2027) - Unmitigated

3.11. Building Construction (2028) - Unmitigated

3.13. Paving (2026) - Unmitigated

3.15. Architectural Coating (2026) - Unmitigated

3.17. Architectural Coating (2027) - Unmitigated

3.19. Architectural Coating (2028) - Unmitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

8. User Changes to Default Data

8.1. Justifications

8.3. Land Use

8.4. Construction

8.4.1. Construction Phases

8.5. Operations

8.5.1. Mobile Sources

8.5.1.1. Vehicle Data

8.5.2. Area Sources

8.5.2.1. Hearths

8.5.2.3. Architectural Coatings

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Yosemite Mixed Use Conversion GPA - Mitigated
Construction Start Date	6/1/2026
Operational Year	2028
Lead Agency	City of Manteca
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.40000
Precipitation (days)	9.00000
Location	37.795933121457814, -121.2554024176976
County	San Joaquin
City	Manteca
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2166
EDFZ	4
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.37

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
Strip Mall	251.341	1000sqft	5.77000	251,341	50,268.2	—	—	—

Apartments Mid Rise	519.000	Dwelling Unit	17.3100	498,240	326,794	—	1,676.00	—
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1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	15.2938	14.8323	29.2076	39.5016	0.06093	1.24251	19.8040	21.0465	1.14311	10.1369	11.2800	—	10,019.3	10,019.3	0.27119	0.60437	21.0348	10,226.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	15.3232	14.8302	15.9050	36.0124	0.04452	0.44060	5.31576	5.75636	0.40845	1.27692	1.68537	—	9,681.55	9,681.55	0.27437	0.61638	0.61085	9,872.70
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.7176	10.4814	10.6113	24.9264	0.03180	0.28413	3.77551	4.05723	0.26197	0.90672	1.16812	—	6,903.07	6,903.07	0.17881	0.44027	6.48106	7,045.22
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.95597	1.91286	1.93657	4.54906	0.00580	0.05185	0.68903	0.74045	0.04781	0.16548	0.21318	—	1,142.88	1,142.88	0.02960	0.07289	1.07301	1,166.42

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
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Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.81580	3.21246	29.2076	29.6512	0.06093	1.24251	19.8040	21.0465	1.14311	10.1369	11.2800	—	6,779.71	6,779.71	0.27119	0.06010	0.79443	6,805.02
2027	15.2938	14.8323	14.5350	39.5016	0.04452	0.39441	5.31576	5.71018	0.36596	1.27692	1.64288	—	10,019.3	10,019.3	0.23833	0.60437	21.0348	10,226.4
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	15.3232	14.8302	15.9050	36.0124	0.04452	0.44060	5.31576	5.75636	0.40845	1.27692	1.68537	—	9,681.55	9,681.55	0.27437	0.61638	0.61085	9,872.70
2027	15.0026	14.6740	15.1034	34.3561	0.04452	0.39441	5.31576	5.71018	0.36596	1.27692	1.64288	—	9,556.13	9,556.13	0.27437	0.61638	0.54428	9,747.21
2028	14.8338	14.3884	14.3162	33.0455	0.04452	0.35439	5.31576	5.67015	0.32914	1.27692	1.60605	—	9,408.62	9,408.62	0.26237	0.59699	0.48401	9,593.57
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.09110	2.90108	7.74036	11.6188	0.01775	0.28413	2.39763	2.68177	0.26197	0.86078	1.12276	—	2,828.40	2,828.40	0.09005	0.12121	1.85945	2,868.63
2027	10.7176	10.4814	10.6113	24.9264	0.03180	0.28172	3.77551	4.05723	0.26140	0.90672	1.16812	—	6,903.07	6,903.07	0.17881	0.44027	6.48106	7,045.22
2028	2.10109	2.04669	1.72458	4.09829	0.00536	0.04273	0.65176	0.69448	0.03968	0.15640	0.19608	—	1,159.58	1,159.58	0.03047	0.07042	0.98869	1,182.32
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.56413	0.52945	1.41262	2.12043	0.00324	0.05185	0.43757	0.48942	0.04781	0.15709	0.20490	—	468.274	468.274	0.01491	0.02007	0.30785	474.935
2027	1.95597	1.91286	1.93657	4.54906	0.00580	0.05141	0.68903	0.74045	0.04771	0.16548	0.21318	—	1,142.88	1,142.88	0.02960	0.07289	1.07301	1,166.42
2028	0.38345	0.37352	0.31474	0.74794	0.00098	0.00780	0.11895	0.12674	0.00724	0.02854	0.03578	—	191.981	191.981	0.00505	0.01166	0.16369	195.746

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	62.2005	59.1317	32.4429	318.754	0.67254	0.73606	56.7266	57.4627	0.69659	14.4261	15.1227	425.149	72,961.2	73,386.4	46.1808	3.33746	195.866	75,731.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	54.5986	51.6562	36.6013	250.286	0.62336	0.70328	56.7266	57.4299	0.67194	14.4261	15.0981	425.149	68,057.9	68,483.0	46.5961	3.59137	10.0793	70,728.2
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	56.9139	53.9193	34.8048	266.911	0.63534	0.71941	56.4013	57.1207	0.68406	14.3448	15.0288	425.149	68,963.6	69,388.7	46.3477	3.46725	87.4903	71,668.1
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.3868	9.84027	6.35188	48.7112	0.11595	0.13129	10.2932	10.4245	0.12484	2.61792	2.74276	70.3883	11,417.7	11,488.1	7.67340	0.57404	14.4850	11,865.5

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	41.2282	38.5910	29.6824	277.068	0.65558	0.51247	56.7266	57.2391	0.48114	14.4261	14.9073	—	66,886.3	66,886.3	2.74242	3.08724	190.732	68,065.6
Area	20.6968	20.4029	0.37081	40.4277	0.00193	0.03320	—	0.03320	0.02507	—	0.02507	0.00000	473.349	473.349	0.06175	0.00790	—	477.245
Energy	0.27555	0.13778	2.38968	1.25824	0.01503	0.19038	—	0.19038	0.19038	—	0.19038	—	5,523.04	5,523.04	0.67448	0.05532	—	5,556.39
Water	—	—	—	—	—	—	—	—	—	—	—	76.1266	78.5199	154.646	7.81861	0.18701	—	405.839
Waste	—	—	—	—	—	—	—	—	—	—	—	349.022	0.00000	349.022	34.8835	0.00000	—	1,221.11
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.13381	5.13381
Total	62.2005	59.1317	32.4429	318.754	0.67254	0.73606	56.7266	57.4627	0.69659	14.4261	15.1227	425.149	72,961.2	73,386.4	46.1808	3.33746	195.866	75,731.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	38.2820	35.4774	34.2116	249.028	0.60832	0.51290	56.7266	57.2395	0.48155	14.4261	14.9077	—	62,106.6	62,106.6	3.16288	3.34219	4.94551	63,186.6
Area	16.0410	16.0410	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	0.00000	349.672	349.672	0.05657	0.00686	—	353.129
Energy	0.27555	0.13778	2.38968	1.25824	0.01503	0.19038	—	0.19038	0.19038	—	0.19038	—	5,523.04	5,523.04	0.67448	0.05532	—	5,556.39
Water	—	—	—	—	—	—	—	—	—	—	—	76.1266	78.5199	154.646	7.81861	0.18701	—	405.839
Waste	—	—	—	—	—	—	—	—	—	—	—	349.022	0.00000	349.022	34.8835	0.00000	—	1,221.11
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.13381	5.13381

Total	54.5986	51.6562	36.6013	250.286	0.62336	0.70328	56.7266	57.4299	0.67194	14.4261	15.0981	425.149	68,057.9	68,483.0	46.5961	3.59137	10.0793	70,728.2
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	38.3014	35.5894	32.2323	245.716	0.61936	0.51265	56.4013	56.9140	0.48132	14.3448	14.8261	—	63,222.5	63,222.5	2.95584	3.22288	82.3565	64,339.1
Area	18.3370	18.1921	0.18286	19.9369	0.00095	0.01637	—	0.01637	0.01236	—	0.01236	0.00000	139.548	139.548	0.01526	0.00205	—	140.541
Energy	0.27555	0.13778	2.38968	1.25824	0.01503	0.19038	—	0.19038	0.19038	—	0.19038	—	5,523.04	5,523.04	0.67448	0.05532	—	5,556.39
Water	—	—	—	—	—	—	—	—	—	—	—	76.1266	78.5199	154.646	7.81861	0.18701	—	405.839
Waste	—	—	—	—	—	—	—	—	—	—	—	349.022	0.00000	349.022	34.8835	0.00000	—	1,221.11
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.13381	5.13381
Total	56.9139	53.9193	34.8048	266.911	0.63534	0.71941	56.4013	57.1207	0.68406	14.3448	15.0288	425.149	68,963.6	69,388.7	46.3477	3.46725	87.4903	71,668.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.99000	6.49507	5.88239	44.8431	0.11303	0.09356	10.2932	10.3868	0.08784	2.61792	2.70576	—	10,467.2	10,467.2	0.48937	0.53358	13.6351	10,652.1
Area	3.34650	3.32006	0.03337	3.63849	0.00017	0.00299	—	0.00299	0.00226	—	0.00226	0.00000	23.1037	23.1037	0.00253	0.00034	—	23.2682
Energy	0.05029	0.02514	0.43612	0.22963	0.00274	0.03474	—	0.03474	0.03474	—	0.03474	—	914.403	914.403	0.11167	0.00916	—	919.924
Water	—	—	—	—	—	—	—	—	—	—	—	12.6036	12.9999	25.6035	1.29446	0.03096	—	67.1914
Waste	—	—	—	—	—	—	—	—	—	—	—	57.7846	0.00000	57.7846	5.77537	0.00000	—	202.169
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.84996	0.84996
Total	10.3868	9.84027	6.35188	48.7112	0.11595	0.13129	10.2932	10.4245	0.12484	2.61792	2.74276	70.3883	11,417.7	11,488.1	7.67340	0.57404	14.4850	11,865.5

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

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

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

Off-Road	2.72490	2.28674	20.6515	19.0056	0.03253	0.84309	—	0.84309	0.77564	—	0.77564	—	3,426.59	3,426.59	0.13900	0.02780	—	3,438.35
Demolition	—	—	—	—	—	—	0.18012	0.18012	—	0.02728	0.02728	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14931	0.12530	1.13159	1.04140	0.00178	0.04620	—	0.04620	0.04250	—	0.04250	—	187.759	187.759	0.00762	0.00152	—	188.403
Demolition	—	—	—	—	—	—	0.00987	0.00987	—	0.00149	0.00149	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02725	0.02287	0.20652	0.19006	0.00033	0.00843	—	0.00843	0.00776	—	0.00776	—	31.0856	31.0856	0.00126	0.00025	—	31.1922
Demolition	—	—	—	—	—	—	0.00180	0.00180	—	0.00027	0.00027	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06371	0.05879	0.03778	0.72255	0.00000	0.00000	0.12601	0.12601	0.00000	0.02954	0.02954	—	135.849	135.849	0.00265	0.00492	0.46612	137.849
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00578	0.00249	0.16704	0.04022	0.00095	0.00271	0.03801	0.04072	0.00271	0.01041	0.01312	—	140.652	140.652	0.00226	0.02224	0.32831	147.663

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00327	0.00299	0.00234	0.03208	0.00000	0.00000	0.00686	0.00686	0.00000	0.00161	0.00161	—	6.89648	6.89648	0.00016	0.00029	0.01103	6.99738
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00031	0.00013	0.00954	0.00222	0.00005	0.00015	0.00207	0.00222	0.00015	0.00057	0.00072	—	7.70896	7.70896	0.00012	0.00122	0.00772	8.08286
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00060	0.00054	0.00043	0.00586	0.00000	0.00000	0.00125	0.00125	0.00000	0.00029	0.00029	—	1.14179	1.14179	0.00003	0.00005	0.00183	1.15850
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00006	0.00002	0.00174	0.00041	0.00001	0.00003	0.00038	0.00041	0.00003	0.00010	0.00013	—	1.27631	1.27631	0.00002	0.00020	0.00128	1.33821

3.3. Site Preparation (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.74146	3.14387	29.1635	28.8082	0.04890	1.24251	—	1.24251	1.14311	—	1.14311	—	5,297.94	5,297.94	0.21491	0.04298	—	5,316.12
Dust From Material Movement	—	—	—	—	—	—	19.6570	19.6570	—	10.1024	10.1024	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

ATTACHMENT 8

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10251	0.08613	0.79900	0.78927	0.00134	0.03404	—	0.03404	0.03132	—	0.03132	—	145.149	145.149	0.00589	0.00118	—	145.647
Dust From Material Movement	—	—	—	—	—	—	0.53855	0.53855	—	0.27678	0.27678	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01871	0.01572	0.14582	0.14404	0.00024	0.00621	—	0.00621	0.00572	—	0.00572	—	24.0311	24.0311	0.00097	0.00019	—	24.1135
Dust From Material Movement	—	—	—	—	—	—	0.09829	0.09829	—	0.05051	0.05051	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07433	0.06859	0.04407	0.84297	0.00000	0.00000	0.14701	0.14701	0.00000	0.03446	0.03446	—	158.491	158.491	0.00309	0.00574	0.54381	160.824
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00191	0.00174	0.00136	0.01872	0.00000	0.00000	0.00400	0.00400	0.00000	0.00094	0.00094	—	4.02294	4.02294	0.00010	0.00017	0.00643	4.08181

Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00035	0.00032	0.00025	0.00342	0.00000	0.00000	0.00073	0.00073	0.00000	0.00017	0.00017	—	0.66604	0.66604	0.00002	0.00003	0.00107	0.67579	
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	

3.5. Grading (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.62261	3.04400	27.2253	27.5707	0.06093	1.12137	—	1.12137	1.03166	—	1.03166	—	6,598.58	6,598.58	0.26767	0.05353	—	6,621.22
Dust From Material Movement	—	—	—	—	—	—	9.20359	9.20359	—	3.65375	3.65375	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34737	0.29189	2.61064	2.64376	0.00584	0.10753	—	0.10753	0.09893	—	0.09893	—	632.740	632.740	0.02567	0.00513	—	634.912

Dust From Material Movement	—	—	—	—	—	—	0.88254	0.88254	—	0.35036	0.35036	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06340	0.05327	0.47644	0.48249	0.00107	0.01962	—	0.01962	0.01805	—	0.01805	—	104.757	104.757	0.00425	0.00085	—	105.117
Dust From Material Movement	—	—	—	—	—	—	0.16106	0.16106	—	0.06394	0.06394	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08495	0.07839	0.05037	0.96340	0.00000	0.00000	0.16801	0.16801	0.00000	0.03938	0.03938	—	181.132	181.132	0.00353	0.00657	0.62149	183.799
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00764	0.00697	0.00546	0.07486	0.00000	0.00000	0.01602	0.01602	0.00000	0.00375	0.00375	—	16.0918	16.0918	0.00038	0.00067	0.02574	16.3272
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00139	0.00127	0.00100	0.01366	0.00000	0.00000	0.00292	0.00292	0.00000	0.00068	0.00068	—	2.66418	2.66418	0.00006	0.00011	0.00426	2.70316

Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.7. Building Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.27993	1.07101	9.85401	12.9664	0.02340	0.37865	—	0.37865	0.34836	—	0.34836	—	2,397.24	2,397.24	0.09724	0.01945	—	2,405.47	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.23044	0.19282	1.77411	2.33446	0.00421	0.06817	—	0.06817	0.06272	—	0.06272	—	431.597	431.597	0.01751	0.00350	—	433.078	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04205	0.03519	0.32377	0.42604	0.00077	0.01244	—	0.01244	0.01145	—	0.01145	—	71.4558	71.4558	0.00290	0.00058	—	71.7010	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.81877	1.64968	1.44174	17.3175	0.00000	0.00000	3.81485	3.81485	0.00000	0.89419	0.89419	—	3,717.34	3,717.34	0.10011	0.15908	0.36597	3,767.61
Vendor	0.13726	0.08142	3.46449	1.13217	0.01940	0.03879	0.73795	0.77674	0.03879	0.20388	0.24267	—	2,690.00	2,690.00	0.05158	0.40495	0.17168	2,812.13
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.32565	0.29701	0.23273	3.19135	0.00000	0.00000	0.68285	0.68285	0.00000	0.16000	0.16000	—	686.003	686.003	0.01622	0.02864	1.09714	696.041
Vendor	0.02510	0.01543	0.61100	0.20000	0.00349	0.00698	0.13221	0.13920	0.00698	0.03655	0.04353	—	484.064	484.064	0.00929	0.07291	0.51432	506.536
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05943	0.05420	0.04247	0.58242	0.00000	0.00000	0.12462	0.12462	0.00000	0.02920	0.02920	—	113.576	113.576	0.00269	0.00474	0.18164	115.237
Vendor	0.00458	0.00282	0.11151	0.03650	0.00064	0.00127	0.02413	0.02540	0.00127	0.00667	0.00794	—	80.1422	80.1422	0.00154	0.01207	0.08515	83.8629
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.9. Building Construction (2027) - 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	1.23076	1.02988	9.39093	12.9379	0.02340	0.33657	—	0.33657	0.30965	—	0.30965	—	2,397.08	2,397.08	0.09724	0.01945	—	2,405.30

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23076	1.02988	9.39093	12.9379	0.02340	0.33657	—	0.33657	0.30965	—	0.30965	—	2,397.08	2,397.08	0.09724	0.01945	—	2,405.30	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.87911	0.73563	6.70781	9.24139	0.01671	0.24041	—	0.24041	0.22118	—	0.22118	—	1,712.20	1,712.20	0.06945	0.01389	—	1,718.07	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16044	0.13425	1.22418	1.68655	0.00305	0.04387	—	0.04387	0.04036	—	0.04036	—	283.474	283.474	0.01150	0.00230	—	284.447	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.83879	1.68972	1.00454	20.3247	0.00000	0.00000	3.81485	3.81485	0.00000	0.89419	0.89419	—	4,047.69	4,047.69	0.07008	0.14907	12.6985	4,106.57	
Vendor	0.14152	0.08355	3.10749	1.04862	0.01940	0.03879	0.73795	0.77674	0.03879	0.20388	0.24267	—	2,631.49	2,631.49	0.05158	0.40495	5.79664	2,759.25	
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	1.59962	1.55957	1.30268	16.0048	0.00000	0.00000	3.81485	3.81485	0.00000	0.89419	0.89419	—	3,659.72	3,659.72	0.10011	0.15908	0.32853	3,709.95
Vendor	0.13726	0.08142	3.31807	1.08698	0.01940	0.03879	0.73795	0.77674	0.03879	0.20388	0.24267	—	2,633.88	2,633.88	0.05158	0.40495	0.15005	2,755.99
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.14259	1.11398	0.82401	11.7666	0.00000	0.00000	2.70914	2.70914	0.00000	0.63477	0.63477	—	2,679.29	2,679.29	0.05721	0.11363	3.91508	2,718.50
Vendor	0.09956	0.05816	2.32103	0.76119	0.01385	0.02771	0.52454	0.55225	0.02771	0.14499	0.17270	—	1,880.35	1,880.35	0.03684	0.28925	1.78297	1,969.25
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.20852	0.20330	0.15038	2.14741	0.00000	0.00000	0.49442	0.49442	0.00000	0.11585	0.11585	—	443.588	443.588	0.00947	0.01881	0.64819	450.079
Vendor	0.01817	0.01061	0.42359	0.13892	0.00253	0.00506	0.09573	0.10079	0.00506	0.02646	0.03152	—	311.314	311.314	0.00610	0.04789	0.29519	326.032
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.11. Building Construction (2028) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18481	0.99143	8.92495	12.9352	0.02340	0.30024	—	0.30024	0.27622	—	0.27622	—	2,397.46	2,397.46	0.09725	0.01945	—	2,405.68
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.14144	0.11835	1.06541	1.54413	0.00279	0.03584	—	0.03584	0.03297	—	0.03297	—	286.193	286.193	0.01161	0.00232	—	287.176
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02581	0.02160	0.19444	0.28180	0.00051	0.00654	—	0.00654	0.00602	—	0.00602	—	47.3826	47.3826	0.00192	0.00038	—	47.5452
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.51953	1.36045	1.16362	14.9602	0.00000	0.00000	3.81485	3.81485	0.00000	0.89419	0.89419	—	3,589.48	3,589.48	0.09010	0.15908	0.29448	3,639.43
Vendor	0.11786	0.07929	3.18678	1.03967	0.01940	0.03879	0.73795	0.77674	0.03879	0.20388	0.24267	—	2,570.27	2,570.27	0.05158	0.38556	0.13063	2,686.59
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.18259	0.16360	0.13532	1.82053	0.00000	0.00000	0.45276	0.45276	0.00000	0.10609	0.10609	—	439.146	439.146	0.00956	0.01780	0.58521	445.273
Vendor	0.01382	0.00946	0.37197	0.12182	0.00232	0.00463	0.08766	0.09229	0.00463	0.02423	0.02886	—	306.656	306.656	0.00616	0.04577	0.25957	320.709
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03332	0.02986	0.02470	0.33225	0.00000	0.00000	0.08263	0.08263	0.00000	0.01936	0.01936	—	72.7057	72.7057	0.00158	0.00295	0.09689	73.7201
Vendor	0.00252	0.00173	0.06788	0.02223	0.00042	0.00085	0.01600	0.01684	0.00085	0.00442	0.00527	—	50.7703	50.7703	0.00102	0.00758	0.04297	53.0970
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.13. Paving (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.90546	0.76084	7.11822	9.93804	0.01395	0.31987	—	0.31987	0.29428	—	0.29428	—	1,510.59	1,510.59	0.06128	0.01226	—	1,515.78
Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04961	0.04169	0.39004	0.54455	0.00076	0.01753	—	0.01753	0.01612	—	0.01612	—	82.7721	82.7721	0.00336	0.00067	—	83.0562
Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00905	0.00761	0.07118	0.09938	0.00014	0.00320	—	0.00320	0.00294	—	0.00294	—	13.7039	13.7039	0.00056	0.00011	—	13.7509
Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06371	0.05879	0.03778	0.72255	0.00000	0.00000	0.12601	0.12601	0.00000	0.02954	0.02954	—	135.849	135.849	0.00265	0.00492	0.46612	137.849
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00327	0.00299	0.00234	0.03208	0.00000	0.00000	0.00686	0.00686	0.00000	0.00161	0.00161	—	6.89648	6.89648	0.00016	0.00029	0.01103	6.99738
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00060	0.00054	0.00043	0.00586	0.00000	0.00000	0.00125	0.00125	0.00000	0.00029	0.00029	—	1.14179	1.14179	0.00003	0.00005	0.00183	1.15850
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.15. Architectural Coating (2026) - Unmitigated

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

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

ATTACHMENT 8

Off-Road Equipment	0.14557	0.12031	0.85645	1.13283	0.00173	0.02315	—	0.02315	0.02130	—	0.02130	—	133.504	133.504	0.00542	0.00108	—	133.963
Architectural Coatings	11.5779	11.5779	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02222	0.01836	0.13073	0.17292	0.00026	0.00353	—	0.00353	0.00325	—	0.00325	—	20.3784	20.3784	0.00083	0.00017	—	20.4483
Architectural Coatings	1.76727	1.76727	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00406	0.00335	0.02386	0.03156	0.00005	0.00064	—	0.00064	0.00059	—	0.00059	—	3.37387	3.37387	0.00014	0.00003	—	3.38545
Architectural Coatings	0.32253	0.32253	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.36375	0.32994	0.28835	3.46350	0.00000	0.00000	0.76297	0.76297	0.00000	0.17884	0.17884	—	743.467	743.467	0.02002	0.03182	0.07319	753.522
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05522	0.05036	0.03946	0.54114	0.00000	0.00000	0.11579	0.11579	0.00000	0.02713	0.02713	—	116.322	116.322	0.00275	0.00486	0.18604	118.024
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01008	0.00919	0.00720	0.09876	0.00000	0.00000	0.02113	0.02113	0.00000	0.00495	0.00495	—	19.2585	19.2585	0.00046	0.00080	0.03080	19.5403
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.17. Architectural Coating (2027) - 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	0.13715	0.11335	0.83116	1.12539	0.00173	0.01905	—	0.01905	0.01752	—	0.01752	—	133.513	133.513	0.00542	0.00108	—	133.971
Architectural Coatings	11.5779	11.5779	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

ATTACHMENT 8

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13715	0.11335	0.83116	1.12539	0.00173	0.01905	—	0.01905	0.01752	—	0.01752	—	133.513	133.513	0.00542	0.00108	—	133.971	
Architectural Coatings	11.5779	11.5779	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Off-Road Equipment	0.09797	0.08096	0.59369	0.80385	0.00123	0.01361	—	0.01361	0.01252	—	0.01252	—	95.3662	95.3662	0.00387	0.00077	—	95.6935	
Architectural Coatings	8.26990	8.26990	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Off-Road Equipment	0.01788	0.01478	0.10835	0.14670	0.00022	0.00248	—	0.00248	0.00228	—	0.00228	—	15.7890	15.7890	0.00064	0.00013	—	15.8432	
Architectural Coatings	1.50926	1.50926	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.36776	0.33794	0.20091	4.06495	0.00000	0.00000	0.76297	0.76297	0.00000	0.17884	0.17884	—	809.539	809.539	0.01402	0.02981	2.53969	821.313
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.31992	0.31191	0.26054	3.20096	0.00000	0.00000	0.76297	0.76297	0.00000	0.17884	0.17884	—	731.943	731.943	0.02002	0.03182	0.06571	741.991
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22852	0.22280	0.16480	2.35332	0.00000	0.00000	0.54183	0.54183	0.00000	0.12695	0.12695	—	535.859	535.859	0.01144	0.02273	0.78302	543.700
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04170	0.04066	0.03008	0.42948	0.00000	0.00000	0.09888	0.09888	0.00000	0.02317	0.02317	—	88.7175	88.7175	0.00189	0.00376	0.12964	90.0158
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.19. Architectural Coating (2028) - Unmitigated

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

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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12985	0.10731	0.80814	1.11833	0.00173	0.01536	—	0.01536	0.01413	—	0.01413	—	133.517	133.517	0.00542	0.00108	—	133.975
Architectural Coatings	11.5779	11.5779	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01906	0.01575	0.11861	0.16414	0.00025	0.00225	—	0.00225	0.00207	—	0.00207	—	19.5964	19.5964	0.00079	0.00016	—	19.6637
Architectural Coatings	1.69930	1.69930	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00348	0.00287	0.02165	0.02996	0.00005	0.00041	—	0.00041	0.00038	—	0.00038	—	3.24441	3.24441	0.00013	0.00003	—	3.25555
Architectural Coatings	0.31012	0.31012	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.30391	0.27209	0.23272	2.99204	0.00000	0.00000	0.76297	0.76297	0.00000	0.17884	0.17884	—	717.895	717.895	0.01802	0.03182	0.05890	727.886
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04490	0.04023	0.03328	0.44767	0.00000	0.00000	0.11133	0.11133	0.00000	0.02609	0.02609	—	107.987	107.987	0.00235	0.00438	0.14390	109.493
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00819	0.00734	0.00607	0.08170	0.00000	0.00000	0.02032	0.02032	0.00000	0.00476	0.00476	—	17.8784	17.8784	0.00039	0.00072	0.02383	18.1279
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	29.9308	28.1079	20.6443	190.821	0.44381	0.34882	38.2904	38.6392	0.32744	9.73760	10.0650	—	45,281.3	45,281.3	1.93979	2.13278	128.744	46,094.1

Apartment Mid Rise	11.2974	10.4831	9.03813	86.2467	0.21177	0.16365	18.4363	18.5999	0.15370	4.68852	4.84222	—	21,605.0	21,605.0	0.80262	0.95446	61.9882	21,971.5
Total	41.2282	38.5910	29.6824	277.068	0.65558	0.51247	56.7266	57.2391	0.48114	14.4261	14.9073	—	66,886.3	66,886.3	2.74242	3.08724	190.732	68,065.6
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	27.7541	25.8036	23.7887	173.635	0.41195	0.34914	38.2904	38.6395	0.32775	9.73760	10.0654	—	42,058.9	42,058.9	2.25327	2.31055	3.33821	42,807.1
Apartment Mid Rise	10.5279	9.67380	10.4229	75.3929	0.19637	0.16377	18.4363	18.6000	0.15381	4.68852	4.84232	—	20,047.7	20,047.7	0.90961	1.03164	1.60730	20,379.5
Total	38.2820	35.4774	34.2116	249.028	0.60832	0.51290	56.7266	57.2395	0.48155	14.4261	14.9077	—	62,106.6	62,106.6	3.16288	3.34219	4.94551	63,186.6
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	5.06827	4.72500	4.08899	31.1157	0.07654	0.06368	6.94792	7.01160	0.05978	1.76709	1.82688	—	7,087.69	7,087.69	0.34759	0.36868	9.20363	7,215.45
Apartment Mid Rise	1.92173	1.77007	1.79340	13.7274	0.03650	0.02988	3.34532	3.37520	0.02806	0.85083	0.87889	—	3,379.51	3,379.51	0.14178	0.16491	4.43142	3,436.62
Total	6.99000	6.49507	5.88239	44.8431	0.11303	0.09356	10.2932	10.3868	0.08784	2.61792	2.70576	—	10,467.2	10,467.2	0.48937	0.53358	13.6351	10,652.1

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	1,223.73	1,223.73	0.19797	0.02400	—	1,235.83
Apartment Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	1,310.38	1,310.38	0.21199	0.02570	—	1,323.33

Total	—	—	—	—	—	—	—	—	—	—	—	—	2,534.11	2,534.11	0.40996	0.04969	—	2,559.17
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	1,223.73	1,223.73	0.19797	0.02400	—	1,235.83
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	1,310.38	1,310.38	0.21199	0.02570	—	1,323.33
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,534.11	2,534.11	0.40996	0.04969	—	2,559.17
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	202.603	202.603	0.03278	0.00397	—	204.606
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	216.948	216.948	0.03510	0.00425	—	219.093
Total	—	—	—	—	—	—	—	—	—	—	—	—	419.551	419.551	0.06787	0.00823	—	423.699

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	0.06405	0.03203	0.58232	0.48915	0.00349	0.04426	—	0.04426	0.04426	—	0.04426	—	694.802	694.802	0.06149	0.00131	—	696.729
Apartments Mid Rise	0.21150	0.10575	1.80736	0.76909	0.01154	0.14613	—	0.14613	0.14613	—	0.14613	—	2,294.13	2,294.13	0.20303	0.00432	—	2,300.49
Total	0.27555	0.13778	2.38968	1.25824	0.01503	0.19038	—	0.19038	0.19038	—	0.19038	—	2,988.93	2,988.93	0.26452	0.00563	—	2,997.22
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Strip Mall	0.06405	0.03203	0.58232	0.48915	0.00349	0.04426	—	0.04426	0.04426	—	0.04426	—	694.802	694.802	0.06149	0.00131	—	696.729
Apartments Mid Rise	0.21150	0.10575	1.80736	0.76909	0.01154	0.14613	—	0.14613	0.14613	—	0.14613	—	2,294.13	2,294.13	0.20303	0.00432	—	2,300.49
Total	0.27555	0.13778	2.38968	1.25824	0.01503	0.19038	—	0.19038	0.19038	—	0.19038	—	2,988.93	2,988.93	0.26452	0.00563	—	2,997.22
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	0.01169	0.00585	0.10627	0.08927	0.00064	0.00808	—	0.00808	0.00808	—	0.00808	—	115.032	115.032	0.01018	0.00022	—	115.351
Apartments Mid Rise	0.03860	0.01930	0.32984	0.14036	0.00211	0.02667	—	0.02667	0.02667	—	0.02667	—	379.820	379.820	0.03361	0.00072	—	380.873
Total	0.05029	0.02514	0.43612	0.22963	0.00274	0.03474	—	0.03474	0.03474	—	0.03474	—	494.852	494.852	0.04379	0.00093	—	496.224

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	0.00000	349.672	349.672	0.05657	0.00686	—	353.129
Consumer Products	16.0410	16.0410	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	4.65573	4.36186	0.37081	40.4277	0.00193	0.03320	—	0.03320	0.02507	—	0.02507	—	123.677	123.677	0.00518	0.00104	—	124.116

Total	20.6968	20.4029	0.37081	40.4277	0.00193	0.03320	—	0.03320	0.02507	—	0.02507	0.00000	473.349	473.349	0.06175	0.00790	—	477.245
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	0.00000	349.672	349.672	0.05657	0.00686	—	353.129
Consumer Products	16.0410	16.0410	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	16.0410	16.0410	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	0.00000	349.672	349.672	0.05657	0.00686	—	353.129
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	0.00000	13.0059	13.0059	0.00210	0.00026	—	13.1345
Consumer Products	2.92749	2.92749	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.41902	0.39257	0.03337	3.63849	0.00017	0.00299	—	0.00299	0.00226	—	0.00226	—	10.0978	10.0978	0.00042	0.00008	—	10.1337
Total	3.34650	3.32006	0.03337	3.63849	0.00017	0.00299	—	0.00299	0.00226	—	0.00226	0.00000	23.1037	23.1037	0.00253	0.00034	—	23.2682

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	35.6754	34.6059	70.2814	3.66371	0.08759	—	187.977
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	40.4511	43.9140	84.3651	4.15491	0.09941	—	217.862
Total	—	—	—	—	—	—	—	—	—	—	—	76.1266	78.5199	154.646	7.81861	0.18701	—	405.839
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	35.6754	34.6059	70.2814	3.66371	0.08759	—	187.977
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	40.4511	43.9140	84.3651	4.15491	0.09941	—	217.862
Total	—	—	—	—	—	—	—	—	—	—	—	76.1266	78.5199	154.646	7.81861	0.18701	—	405.839
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	5.90648	5.72941	11.6359	0.60657	0.01450	—	31.1218
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	6.69715	7.27046	13.9676	0.68789	0.01646	—	36.0696
Total	—	—	—	—	—	—	—	—	—	—	—	12.6036	12.9999	25.6035	1.29446	0.03096	—	67.1914

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	142.230	0.00000	142.230	14.2154	0.00000	—	497.615
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	206.792	0.00000	206.792	20.6681	0.00000	—	723.495
Total	—	—	—	—	—	—	—	—	—	—	—	349.022	0.00000	349.022	34.8835	0.00000	—	1,221.11
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	142.230	0.00000	142.230	14.2154	0.00000	—	497.615
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	206.792	0.00000	206.792	20.6681	0.00000	—	723.495
Total	—	—	—	—	—	—	—	—	—	—	—	349.022	0.00000	349.022	34.8835	0.00000	—	1,221.11
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	23.5478	0.00000	23.5478	2.35352	0.00000	—	82.3859
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	34.2368	0.00000	34.2368	3.42184	0.00000	—	119.783
Total	—	—	—	—	—	—	—	—	—	—	—	57.7846	0.00000	57.7846	5.77537	0.00000	—	202.169

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.56541	1.56541
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.56840	3.56840
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.13381	5.13381
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.56541	1.56541
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.56840	3.56840
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.13381	5.13381
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.25917	0.25917
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.59079	0.59079
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.84996	0.84996

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Demolition	Demolition	6/1/2026	6/29/2026	5.00000	20.0000	—
Site Preparation	Site Preparation	6/30/2026	7/14/2026	5.00000	10.00000	—
Grading	Grading	7/15/2026	9/2/2026	5.00000	35.0000	—

Building Construction	Building Construction	10/1/2026	3/1/2028	5.00000	370.000	—
Paving	Paving	9/3/2026	9/30/2026	5.00000	20.0000	—
Architectural Coating	Architectural Coating	10/15/2026	3/15/2028	5.00000	370.000	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.000000	8.00000	33.0000	0.73000
Demolition	Excavators	Diesel	Average	3.00000	8.00000	36.0000	0.38000
Demolition	Rubber Tired Dozers	Diesel	Average	2.00000	8.00000	367.000	0.40000
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00000	8.00000	367.000	0.40000
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	4.00000	8.00000	84.0000	0.37000
Grading	Excavators	Diesel	Average	2.00000	8.00000	36.0000	0.38000
Grading	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Grading	Rubber Tired Dozers	Diesel	Average	1.000000	8.00000	367.000	0.40000
Grading	Scrapers	Diesel	Average	2.00000	8.00000	423.000	0.48000
Grading	Tractors/Loaders/Back hoes	Diesel	Average	2.00000	8.00000	84.0000	0.37000
Building Construction	Cranes	Diesel	Average	1.000000	7.00000	367.000	0.29000
Building Construction	Forklifts	Diesel	Average	3.00000	8.00000	82.0000	0.20000
Building Construction	Generator Sets	Diesel	Average	1.000000	8.00000	14.0000	0.74000
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	3.00000	7.00000	84.0000	0.37000
Building Construction	Welders	Diesel	Average	1.000000	8.00000	46.0000	0.45000
Paving	Pavers	Diesel	Average	2.00000	8.00000	81.0000	0.42000
Paving	Paving Equipment	Diesel	Average	2.00000	8.00000	89.0000	0.36000
Paving	Rollers	Diesel	Average	2.00000	8.00000	36.0000	0.38000

Architectural Coating	Air Compressors	Diesel	Average	1.000000	6.00000	37.0000	0.48000
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5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Worker	15.0000	11.8900	LDA,LDT1,LDT2
Demolition	Vendor	—	9.10000	HHDT,MHDT
Demolition	Hauling	2.05000	20.0000	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	Worker	17.5000	11.8900	LDA,LDT1,LDT2
Site Preparation	Vendor	—	9.10000	HHDT,MHDT
Site Preparation	Hauling	0.00000	20.0000	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	20.0000	11.8900	LDA,LDT1,LDT2
Grading	Vendor	—	9.10000	HHDT,MHDT
Grading	Hauling	0.00000	20.0000	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	454.109	11.8900	LDA,LDT1,LDT2
Building Construction	Vendor	96.6759	9.10000	HHDT,MHDT
Building Construction	Hauling	0.00000	20.0000	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	15.0000	11.8900	LDA,LDT1,LDT2
Paving	Vendor	—	9.10000	HHDT,MHDT
Paving	Hauling	0.00000	20.0000	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	90.8218	11.8900	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	9.10000	HHDT,MHDT

Architectural Coating	Hauling	0.00000	20.0000	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	1,008,936	336,312	377,012	125,671	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00000	0.00000	0.00000	3,522.60	0.00000
Site Preparation	—	—	15.0000	0.00000	0.00000
Grading	—	—	105.000	0.00000	0.00000
Paving	0.00000	0.00000	0.00000	0.00000	0.00000

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Strip Mall	0.00000	0%
Paving	Apartments Mid Rise	—	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00000	203.983	0.03300	0.00400
2027	0.00000	203.983	0.03300	0.00400
2028	0.00000	203.983	0.03300	0.00400

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
Strip Mall	8,231.17	8,231.17	8,231.17	3,004,376	53,776.0	53,776.0	53,776.0	19,628,242
Apartments Mid Rise	2,900.69	2,900.69	2,900.69	1,058,752	25,892.4	25,892.4	25,892.4	9,450,720

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Strip Mall	Wood Fireplaces	0	0
Strip Mall	Gas Fireplaces	0	0
Strip Mall	Propane Fireplaces	0	0
Strip Mall	Electric Fireplaces	0	0
Strip Mall	No Fireplaces	0	0
Strip Mall	Conventional Wood Stoves	0	0
Strip Mall	Catalytic Wood Stoves	0	0
Strip Mall	Non-Catalytic Wood Stoves	0	0
Strip Mall	Pellet Wood Stoves	0	0

Apartments Mid Rise	Wood Fireplaces	0	0
Apartments Mid Rise	Gas Fireplaces	0	0
Apartments Mid Rise	Propane Fireplaces	0	0
Apartments Mid Rise	Electric Fireplaces	519	519
Apartments Mid Rise	No Fireplaces	0	0
Apartments Mid Rise	Conventional Wood Stoves	0	0
Apartments Mid Rise	Catalytic Wood Stoves	0	0
Apartments Mid Rise	Non-Catalytic Wood Stoves	0	0
Apartments Mid Rise	Pellet Wood Stoves	0	0

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)
1,008,936	336,312	377,012	125,671	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00000
Summer Days	day/yr	180.000

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)
Strip Mall	2,189,702	203.983	0.0330	0.0040	2,167,967
Apartments Mid Rise	2,344,744	203.983	0.0330	0.0040	7,158,303

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Strip Mall	18,617,462	705,568
Apartments Mid Rise	21,109,689	5,606,206

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Strip Mall	263.908	0.00000
Apartments Mid Rise	383.702	0.00000

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088.00	0.00180	4.00000	4.00000	18.0000
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430.00	0.03750	1.000000	0.00000	1.000000
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922.00	0.00040	7.50000	7.50000	20.0000
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088.00	0.00225	2.50000	2.50000	10.00000
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430.00	0.11538	0.60000	0.00000	1.000000

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

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

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Land Use	Building square footage and acreage adjusted to represent the proposed buildout of the site.
Construction: Construction Phases	Based on typical construction practices, architectural coating assumed to start two weeks after the start of building construction and last for the same number of days.
Operations: Vehicle Data	Trip rates adjusted to be consistent with transportation assessment prepared for the proposed project.
Operations: Hearths	All 519 units would include electric fireplaces in compliance with Mitigation Measure III-1.
Operations: Architectural Coatings	The proposed project would use zero-VOC paint in compliance with Mitigation Measure III-1.

8.3. Land Use

Model Parameter	Units	Default Value	New Value
Lot Area	acre	5.77000	5.77000
Landscape Area	sq. ft	—	50,268.2
Lot Area	acre	0.00000	17.3100
Building Area	sq. ft	0.00000	498,240
Landscape Area	sq. ft	—	326,794

8.4. Construction

8.4.1. Construction Phases

Phase Type	Phase Name	Model Parameter	Default Value	New Value
Building Construction	Building Construction	Start Date	9/3/2026	10/1/2026
Building Construction	Building Construction	End Date	2/3/2028	3/1/2028
Paving	Paving	Start Date	2/4/2028	9/3/2026
Paving	Paving	End Date	3/3/2028	9/30/2026
Architectural Coating	Architectural Coating	Start Date	3/4/2028	10/15/2026
Architectural Coating	Architectural Coating	End Date	4/1/2028	3/15/2028

Architectural Coating	Architectural Coating	Work Days per Phase	20.0000	370.000
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8.5. Operations

8.5.1. Mobile Sources

8.5.1.1. Vehicle Data

Land Use	Model Parameter	Units	Default Value	New Value
Strip Mall	Weekday Trip Rate	size/day	44.3200	32.7490
Strip Mall	Saturday Trip Rate	size/day	42.0400	32.7490
Strip Mall	Sunday Trip Rate	size/day	20.4300	32.7490
Apartments Mid Rise	Weekday Trip Rate	size/day	5.44000	5.58900
Apartments Mid Rise	Saturday Trip Rate	size/day	4.91000	5.58900
Apartments Mid Rise	Sunday Trip Rate	size/day	4.09000	5.58900

8.5.2. Area Sources

8.5.2.1. Hearths

Land Use	Model Parameter	Default Value	New Value
Apartments Mid Rise	Gas Fireplaces	260	0
Apartments Mid Rise	Electric Fireplaces	0	519
Apartments Mid Rise	No Fireplaces	260	0
Apartments Mid Rise	Catalytic Wood Stoves	26	0
Apartments Mid Rise	Non-Catalytic Wood Stoves	26	0

8.5.2.3. Architectural Coatings

Model Parameter	Units	Default Value	New Value
Residential Interior VOC	g/L	50.0000	0.00000

Non-Residential Interior VOC	g/L	50.0000	0.00000
Residential Exterior VOC	g/L	50.0000	0.00000
Non-Residential Exterior VOC	g/L	50.0000	0.00000
VOC for Parking Paint	g/L	100.0000	0.00000

APPENDIX B

TRANSPORTATION ASSESSMENT

Memo

Date: January 16, 2026
To: Angela Delarosa and Rod Stinson, Raney Planning & Management
From: Bill Burton, PE, RSP, Fehr & Peers
Subject: DRAFT – Yosemite Avenue Mixed Use Conversion GPA – Transportation Assessment

This draft technical memorandum documents our assessment of the potential transportation related impacts of the proposed Yosemite Avenue Mixed Use Conversion General Plan Amendment (GPA). The proposed GPA would rezone an approximately 19-acre site on the south side of West Yosemite Avenue just west of Airport Way. The site is currently comprised of eight parcels zoned with a mixture of I, MDR, M1, and R2 classifications and the GPA would rezone them to Commercial Mixed-Use (CMU). Our assessment focuses on evaluating the relevant questions presented in Appendix G of the State of California's Environmental Checklist Form. Specifically, would the project cause any of the following issues:

- A. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including roadway, transit, bicycle, and pedestrian facilities.
- B. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Specifically, cause substantial additional VMT per capita, per service population, or other appropriate efficiency measure.
- C. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- D. Result in inadequate emergency access.

Project Description

The proposed GPA would rezone an approximately 19-acre site on the south side of West Yosemite Avenue just west of Airport Way. The site is currently comprised of eight parcels zoned with a mixture of I, MDR, M1 and R2 classifications and the proposed amendment would rezone them to CMU.

Under the existing zoning the site could be developed with a maximum of

- 285,100 square feet of Industrial Uses;
- 160,736 square feet of Public/Quasi-Public Uses;
- 22,651 square feet of Commercial Uses; and
- 131 residential units.

The proposed General Plan Amendment would allow for future development of the site with a maximum of 251,341 square feet of Commercial Uses and 519 residential units.

Trip Generation

The proposed GPA anticipated trip generation was estimated using rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual, 12th Edition (2025)*. Trip generation refers to the process of estimating the amount of vehicle traffic a project would add to the surrounding roadway system. Project trip generation estimates are prepared for the one-hour peak periods during the weekday morning and evening commute when traffic volumes on adjacent streets are typically the highest, as well as for the 24-hour weekday period. **Table 1** presents the maximum anticipated weekday trip generation that could occur on the site with the proposed amendment.

Table 1. Weekday Trip Generation Summary – Proposed GPA

Land Use	Size	Daily Trips	AM Peak Hour			PM Peak Hour		
			Trips	In	Out	Trips	In	Out
Commercial ¹	251,341 s.f.	9,146	286	177	109	970	475	495
Residential ²	519 units	3,223	213	51	162	270	167	103
<i>Subtotal</i>		12,369	499	228	271	1240	642	598
Mixed Use Reduction (10%)		(1,237)	(50)	(23)	(27)	(124)	(64)	(60)
Total Trip Generation		11,132	449	205	244	1,116	578	538

¹ ITE Land Use Code 820 “Shopping Center (>150 ksf)”

² ITE Land Use Code 220, “Multi-Family Housing (Low Rise)”

Source: ITE *Trip Generation Manual, 12th Edition*; ITE *Trip Generation Handbook, 3rd Edition*; Fehr & Peers, 2026.

As presented in Table 1, under the maximum development scenario approximately 11,132 daily vehicle trips, including 449 morning peak hour and 1,116 evening peak hour trips could occur. **Table 2** presents a summary of the maximum anticipated trip generation that could occur at the site under the existing zoning.

Table 2. Trip Generation Summary – Existing Zoning

Land Use	Size	Daily Trips	AM Peak Hour			PM Peak Hour		
			Trips	In	Out	Trips	In	Out
Commercial ¹	22,651 s.f.	1,186	89	49	40	142	71	71
Residential ²	131 units	1,323	93	25	68	123	76	47
Industrial ³	285,100 s.f.	1,026	137	118	19	140	34	106
Public Uses ⁴	160,736 s.f.	91	5	3	2	9	4	5
<i>Subtotal</i>		3,626	324	195	129	414	185	229
Mixed Use Reduction (10%)		(363)	(32)	(20)	(13)	(41)	(19)	(23)
Total Trip Generation		3,263	292	176	116	373	167	206

¹ ITE Land Use Code 822 “Strip Retail Plaza (<40ksf)”

² ITE Land Use Code, 210, “Single-Family Detached Housing”

³ ITE Land Use Code 110, “General Light Industrial”

⁴ ITE Land Use Code 411 “Public Park”

Source: ITE *Trip Generation Manual, 12th Edition*; ITE *Trip Generation Handbook, 3rd Edition*; Fehr & Peers, 2026.

As presented in Table 2, the maximum weekday trips associated with the existing zoning are approximately 3,263 daily vehicle trips, including 292 morning peak hour and 373 evening peak hour trips.

CEQA Review

This section documents our evaluation of the GPA's potential CEQA impacts related to transportation. As discussed above the review includes (A) Plan and Policy Consistency, (B) VMT, (C) Safety and Hazards, and (D) Emergency Vehicle Access.

Program, Plan, Ordinance, and Policy Consistency

Future potential development on the site consistent with the GPA would contribute to and increase use of transit, bicycle, and pedestrian facilities in the city. The GPA is not forecast to generate transit, bicycle, or pedestrian use that would exceed the capacity of area facilities to serve that demand. Development consistent with the GPA would be required to adhere to all applicable General Plan goals, policies, and programs. Additionally, development projects consistent with the GPA would be subject to all applicable city guidelines, standards, and specifications related to the circulation systems, including transit, bicycle, or pedestrian facilities. Specifically, new or modified transit, bicycle, and pedestrian facilities would be subject to and designed in accordance with all applicable federal, state, and local policies.

Development consistent with the GPA would be required to accommodate the future implementation of improvements identified in the city's *Active Transportation Plan* (August 2020). This includes the following improvements:

- Class IV separated bikeway on Yosemite Avenue along the GPA's frontage
- Construction of city standard sidewalks along the site's Yosemite Avenue frontage

Because GPA implementation would be subject to all applicable city guidelines, standards, and specifications, the project would not conflict with adopted policies, plans, or programs. Therefore, impacts would be less than significant with respect to transit, bicycle, and pedestrian facilities and policies.

Vehicle Miles Traveled Analysis

The project's potential impacts relative to vehicle miles traveled (VMT) were assessed using the methodology, thresholds, and criteria of the City of Manteca's *SB 743 Implementation Policy* (2022).

VMT SCREENING CRITERIA

The City of Manteca's *SB 743 Implementation Policy* (2022) describes five screening types that may be applied to screen projects from a project-level VMT assessment. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, the following types of projects should be expected to have a less than significant impact under CEQA and do not require further VMT analysis:

- **Small projects** that would generate fewer than 1,000 average daily trips if consistent with the city's General Plan, or 500 daily trips if not consistent.

- **Affordable housing** that designates units for sale or rent below market rate, and if the units are in an area supported by a quality walking and biking network with nearby retail and employment opportunities.
- **Local serving uses** for retail of 125,000 square feet or less that provides amenities which promote active transportation. Examples include public/quasi-public land uses that support community health, safety, and welfare (e.g., hospitals, police stations, fire stations, community centers, refuse stations, public utilities, neighborhood parks).
- **Projects located in a high-quality transit area (HQTA)** that are within one half mile of the city's Downtown Transit Center or the Altamont Commuter Express (ACE) Manteca/Lathrop station.
- **Projects located in a low VMT area**, but there are no low-VMT transportation analysis zones within the City of Manteca.

PROJECT VMT ASSESSMENT

The proposed project is located within one half mile of the ACE Manteca/Lathrop station and therefore satisfies the city's screening criteria. Because the project is located within a HQTA it can be presumed to have a less than significant impact related to VMT. **Figure 1** illustrates the project site in relation to the ACE station and the area's transportation network.

Emergency Vehicle Access

No specific development projects are associated with the GPA; thus, adequacy of emergency access for development consistent with the GPA cannot be analyzed at this time, but the city maintains the roadway network which would provide access to new development sites in accordance with industry design standards. Emergency access to new development proposed under the GPA would be subject to review by the City of Manteca and responsible emergency service agencies, ensuring the projects would be designed to meet all emergency access and design standards. The city also requires the preparation of construction management plans that minimize temporary obstruction of traffic during site construction.

Additional vehicles associated with new development sites could increase delays for emergency response vehicles during peak commute hours; however, emergency responders maintain response plans which include use of alternate routes, sirens, and other methods to bypass congestion and minimize response times. In addition, California law requires drivers to yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicle passes to ensure the safe and timely passage of emergency vehicles.

Based on the above considerations, adequate emergency access would be provided to the site, and the impact would be less than significant.

Hazards and Safety

Subsequent projects under the GPA, including any new roadway, bicycle, pedestrian, and transit infrastructure improvements, would be subject to and designed in accordance with city standards and specifications which address potential design hazards including sight distance, driveway placement, and signage and striping. Additionally, any new transportation facilities, or improvements to such facilities associated with subsequent projects would be constructed based on industry design standards and best practices consistent with the municipal code and building design and inspection requirements. The city's evaluation of a project's access and circulation will incorporate analysis with respect to city standards for vehicular level of service and queuing, as well as for service to

pedestrians, bicyclists, and transit users. Therefore, development consistent with the GPA would result in a less than significant impact to transportation hazards.

Summary

The maximum development allowed under the proposed GPA would generate approximately 11,132 daily vehicle trips, including 449 morning peak hour and 1,116 evening peak hour trips. Under the existing zoning, the maximum anticipated weekday trips are approximately 3,263 daily trips, including 292 morning peak hour and 373 evening peak hour trips. Thus, the rezoning would increase the maximum number of vehicle trips associated with the site by approximately 7,869 daily, with 157 additional morning peak hour trips and 743 additional evening peak hour trips.

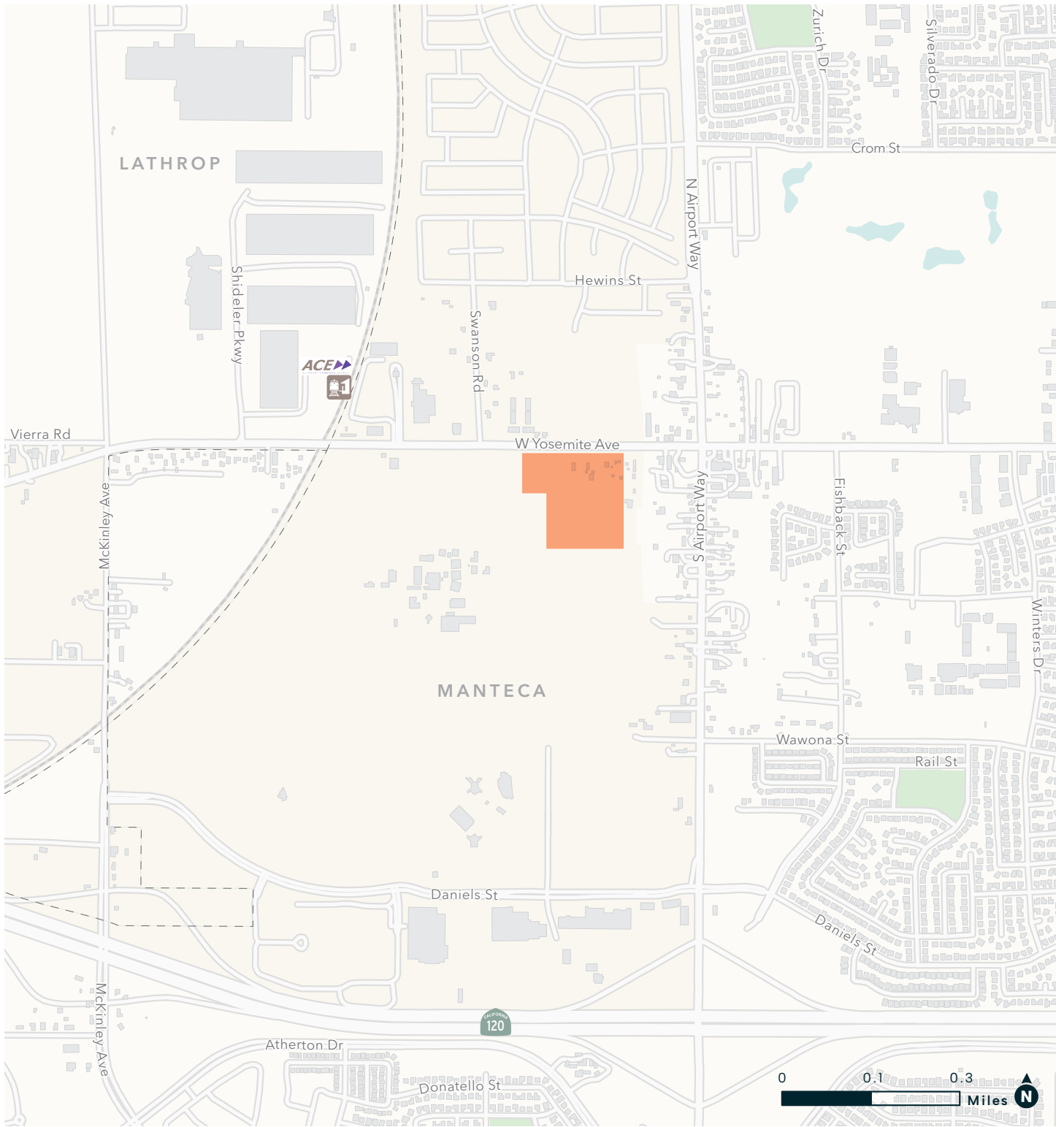
Development consistent with the GPA would be required to accommodate the future implementation of improvements identified in the city's *Active Transportation Plan* (August 2020). This includes the following improvements:

- Class IV separated bikeway on Yosemite Avenue along the GPA's frontage
- Construction of city standard sidewalks along the site's Yosemite Avenue frontage

Because implementation of the GPA would be subject to all applicable city guidelines, standards, and specifications, the project would not conflict with adopted policies, plans, or programs.

The project was found to have a less than significant impact related to VMT as it is located within one half mile of the ACE Manteca/Lathrop station and therefore meets the city's adopted screening criteria for projects located in a high-quality transit area. Finally, the proposed GPA was found to have less than significant impacts related to emergency vehicle access and hazards.

This concludes our assessment. Please do not hesitate to call Bill Burton if you have any questions or require additional information (925.357.3381).



Project Site City Limits

FIGURE 1
Project Location